

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility Permit ID: 9-1402-00269/02001

Mod 0 Effective Date: 08/06/2001 Expiration Date: No expiration date.

Mod 1 Effective Date: 04/28/2005 Expiration Date: No expiration date.

Permit Issued To: HABASIT AG

ROMERSTRASSE 1

Contact: RICHARD MILLER

> HABASIT GLOBE INC 1400 CLINTON STREET BUFFALO, NY 14206 (716) 824-8484

Facility: HABASIT BELTING INC

> 1400 CLINTON ST BUFFALO, NY 14206

Description:

Department intiated modification to address a facility level contaminant that was not properly coded for emissions to meet the capping requirements for VOC and HAP.

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:	DAVID S DENK	
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DIVISION OF ENVIRONMENTAL PERMITS

270 MICHIGAN AVE BUFFALO, NY 14203-2999

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 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 compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and Determinations
Applications for Permit Renewals and Modifications
Applications for Permit Renewals and Modifications
Permit Modifications, Suspensions and Revocations by the Department
Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9 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 1-1: Applications for Permit Renewals and Modifications Applicable State Requirement: 6NYCRR 621.13

Item 1-1.1:

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 1-1.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 1-1.3:

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 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 1

Item 3.1:

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

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Condition 1-2: Permit Modifications, Suspensions and Revocations by the Department Applicable State Requirement: 6NYCRR 621.14

Item 1-2.1:

The Department reserves the right 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.

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
 - b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
 - c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.



**** Facility Level ****

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9

HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

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

NYSDEC Regional Permit Administrator Region 9 Headquarters Division of Environmental Permits 270 Michigan Avenue Buffalo, NY 14203-2999 (716) 851-7165



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: HABASIT AG

ROMERSTRASSE 1

Facility: HABASIT BELTING INC

1400 CLINTON ST BUFFALO, NY 14206

Authorized Activity By Standard Industrial Classification Code:

2241 - NARROW FABRIC MILLS

2295 - COATED FABRICS, NOT RUBBERIZED

2297 - NONWOVEN FABRICS

2399 - FABRICATED TEXTILE PRODUCTS

3052 - RUBBER AND PLASTICS HOSE AND BELTING

Mod 0 Permit Effective Date: 08/06/2001 Permit Expiration Date: No expiration date.

Mod 1 Permit Effective Date: 04/28/2005 Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

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Emission Unit Level

EU=0-00003

24 6NYCRR 212.4(c): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

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1-2 6NYCRR 201-1.4: Unavoidable noncompliance and violations

27 6NYCRR 201-5: Emission Unit Definition

1-3 6NYCRR 201-7: Facility Permissible Emissions

*1-4 6NYCRR 201-7: Capping Monitoring Condition

*1-5 6NYCRR 201-7: Capping Monitoring Condition

*1-6 6NYCRR 201-7: Capping Monitoring Condition

*1-7 6NYCRR 201-7: Capping Monitoring Condition

29 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

30 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

Air Pollution Control Permit Conditions Page 3 of 27 FINAL



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 - 6NYCRR Part 201-1.2

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

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

Item E: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event



occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

- (b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

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

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

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

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

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

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific



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

Item J: Required Emission Tests - 6 NYCRR Part 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 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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.

Item L: Open Fires - 6 NYCRR Part 215

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Item M: 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 N: 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 2: False statement

Effective between the dates of 08/06/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.3

Item 2.1:

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 22: Compliance Demonstration

Effective between the dates of 08/06/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Item 22.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 22.2:

Air Pollution Control Permit Conditions Page 7 of 27 FINAL



Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Maximum permitted pounds of volatile organic compound per gallon (minus water and excluded VOC) of coating at application is limited in this regulation under table 1 to less than 2.90 . Records of MSDS sheets or equivalent will be maintained to demonstrate compliance with this limit. This applies to all coating lines described in emission unit 0001 and 0002.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT Upper Permit Limit: 2.90 pounds per gallon Reference Test Method: approved epa methods

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

**** Emission Unit Level ****

Condition 24: Compliance Demonstration

Effective between the dates of 08/06/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Air Pollution Control Permit Conditions Page 8 of 27 FINAL



Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.05 grains per dscf Reference Test Method: EPA Method 5 Monitoring Frequency: ANNUALLY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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



STATE ONLY ENFORCEABLE CONDITIONS **** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

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

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

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



law.

STATE ONLY APPLICABLE REQUIREMENTS The following conditions are state only enforceable.

Condition 1-1: Contaminant List

Effective between the dates of 04/28/2005 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 1-1.1:

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

CAS No: 0NY100-00-0

Name: HAP

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

CAS No: 000108-88-3 Name: TOLUENE

CAS No: 0NY998-00-0

Name: VOC

Condition 1-2: Unavoidable noncompliance and violations

Effective between the dates of 04/28/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 1-2.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the



identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

- (b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.
- (c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.
- (d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.
- (e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 27: Emission Unit Definition

Effective between the dates of 08/06/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 27.1(From Mod 1):

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

Emission Unit: 0-00001 Emission Unit Description:

Process code TPA & TPB emission unit 1 TPL-A & TPL-B PVC thermoplastic process lines (2-similar units) emission unit 1 is located in building W018-1. All emission points associated with emission unit 1 exit the roof of building B018-1. Emission unit-1 consists of two process lines used to produce PVC coated fabric. Process information: The manufacturing process of emission unit 1 is a roll to roll coating operation that produces PVC coated conveyor belts



and industrial fabric. Woven and nonwoven fabric is first coated with liquid PVC plastisol compounds. The coated fabric then passes through an oven where heat is used to fuse the PVC compound. When heated, a very small amount of the PVC plastisol is vaporized resulting in VOC emissions. Fusion of PVC plastisol is a liquid at room temperature. Chemically it is a suspension of fine particles of solid PVC resin thoroughly and uniformly dispersed in a liquid plasticizer or blend of liquid plasticizer. When the suspension is heated to temperatures of 200 degrees F to 250 degrees F the physical state changes from liquid to a soft solid. The change of state occurs as the liquid plasticizer swells the solid PVC particles. Heating the plastisol to the 350 F to 370 F range melts the PVC particles. The melted PVC particles in the presence of the plasticizer become amorphous; This is termed fusing of the plastisol. After the fused plastisol is allowed to cool its physical properties (at room temperature) resemble those of some rubber compounds. When heated a very small amount the plasticizer is vaporized, resulting in VOC emissions. Thermoplastic line a (TPL-A) - the TPL-A process line is a roll to roll operation that produces PVC coated conveyor belts and industrial fabric. It coats woven and nonwoven fabric with PVC plastisol compounds, fuses the compound using infrared heat and smoothest or embosses one or both surfaces. Optional web paths allow a variety of coating methods including dipping, knife on web, and spread coating. Fabric pulled from the unwind passes through a coating station into the process oven. Exiting the oven the belt is smoothed or embossed and slit to width. The trimmed belt is rolled up using a winder at the end of the line. Edge trim from trimming operation is collected separately. Rolls are removed from the winder and placed in inventory for additional processing or shipment to end-users as finished product. The location and identification of emission sources and emission points associated with thermoplastic line a are as follows: TPL-A is located along the east wall of building W018-1. It utilizes a single structure, multiple zone, electric IR process oven (ES 105). The oven zones temperatures are individually controlled by the operator. Process VOC's resulting from heating of the PVC are collected by ducting inside the oven and by a hood at the oven exit. The internal oven vent and the exhaust hood have individual exhaust blowers and associated ducting. The oven and hood ducts are routed to a common stack, emission point 0012A. Thermoplastic line B (TPL-B)- the TPL-B process line is a



roll to roll operation that produces PVC coated conveyor belts and industrial fabric. It coats woven and nonwoven fabric with PVC plastisol compounds, fuses the compound using forces hot air and smoothest or embosses one or both services. PVC compound is applied using one or more dipping-smoothing operations. Fabric pulled from the unwind, passed through two coating stations, into oven zone one. Exiting zone two the web passes through smoothing or embossing rolls and is rolled up using a winder at the end of the line. Optional web paths allow a variety of coating methods. Rolls removed from the winder are placed in inventory for additional processing or shipment to end-users as finished product. The location and identification of emission sources associated with thermoplastic line-B are as follows. Thermoplastic line B is located along the west wall of building W018-1. It utilizes a 2 zone, forced air, natural gas fired oven (ES9010). The zones are contained in individual vertical structures. Oven zones temperatures are individually controlled by the operator. Process VOC's resulting from heating of the PVC are collected by ducting on top of the oven structures and by an exhaust hood that surrounds the oven structures. Combustion by products from the natural gas burners are vented into the oven structures and exit with the process gases. The two oven zones have individual gas burners, exhaust blowers and exhaust ducting. The ducting leads to a common exhaust stack, emission point8A000. Two blowers are used to exhaust the hood surrounding the oven. The hood blowers have separate ducting and exhaust stacks. Emission point EP009 services the south blower and emission point EP008 services the north blower.

Building(s): W018-1

Item 27.2(From Mod 1):

The facility is authorized to perform regulated processes under this permit for: Emission Unit: 0-00002

Emission Unit Description:

One single latex, silicon, polyurethane multi-function process line - emission unit 2 is located in building W018-1. All emission points associated with emission unit 2 exit the roof of building W018-1. EU 2 consists of a single process line used to produce a variety of coated fabric products; Coatings include latex rubber, silicon rubber, and polyurethane. EU 2 is a single production line, roll to roll web operation. The production line is



comprised of four natural gas fired oven structures and 2 chemical coating stations. The production line is used to thermally shrink woven and nonwoven fabric and to produce industrial coated fabric products; Coatings applied and cured include latex rubbers, silicon and polyurethane. 80% of production time is used to manufacture latex coated products. Fabric is heat setting 20% of the time and 10% of the production time is used to manufacture polyurethane, silicone, specialty latex and other products. By far the majority of emissions produced by emission unit 2 are water vapor that is driven off during the drying of latex rubber coatings. It is assumed no emissions result from the thermal shrinking of fabric. Polyurethane and silicone coatings have a very small amount of volatile if any and are assumed to produce no emissions. Multi-function process line C (MPL-C) is a roll to roll operation that produces latex, silicone and polyurethane, conveyor belts and industrial fabric. Woven and nonwoven fabrics are also heat-set on the line. Latex products comprise the vast majority of products processed. Fabric for processing is pulled from the unwind, through a dip coating station into oven zone one and two. Exiting zone two the web passes through a second coating station into oven zones three, four and five. Exiting zone five the web passes through conditioning rolls and is rolled up using a winder at the end of the line. Optional web paths allow a variety of coating techniques. Rolls removed from the winder are placed in inventory for additional processing or shipment to end- users as finished products. The location and identification of emission sources associated with MPL-C are as follows. MPL-C is located in the center of building W018-1. It utilizes a five zone, exposed burner, natural gas fired oven (ES 106). Zones one and two are contained in a single vertical structure. Zones three, four and five are housed in individual horizontal structures. Oven zones temperatures are individually controlled by the operator. Oven zones one and two have separate exhaust blowers. The ducting exiting the zone one and two blowers converge and exit the roof through a common stack, emission point 00010. Oven zones three, four & five have internal exhaust ducting connected to a common blower and exhaust stack, emission point 3C000. Fume hoods are located at the entrance of oven zone three and at the exit of oven zone five. Each exhaust hood is serviced by a separate exhaust blower, ducting and stack. The exhaust stack for the zone three-exhaust hood is emission point 90000, the zone five hood stack is



emission point EP 006.

Building(s): W018-1

Item 27.3(From Mod 1):

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

Emission Unit: 0-00003

Emission Unit Description:

Emission unit 3 (EU 3) other general emissions: EU 3 consists of numerous activities, some facility-wide, which are not associated with specific emission points. It is composed of thirty six (36) looms, four (4) process lines, three (3) maintenance functions, one (1) needle punch loom, the plant mixing operations, two (2) walk-in ovens, and four (4) yarn warping machines. Miscellaneous equipment is also included in emission unit 3. For tracking purposes EU 3 is organized into eleven (11) process units. A table of machinery in EU 3 appears in the appendix. The table contains the machinery name, family, its location in the plant, possible emissions types and associated emission points. Process unit information: Process unit 1 contains all the fabric manufacturing equipment. All fabric manufacturing equipment is located in the east buildings. Polyester, cotton, fiberglass, nylon, nomex and kevlar fabrics are produced in widths from 2 to 96 inches. The fabrics are used as finished product and as substrate for treated products. The needle punch loom produces nonwoven polyester fabric for use as treated product substrate. Yarn particles from the fabric manufacturing operations can escape to the outside atmosphere through building convection vents and building air discharge fans. Process unit 2 contains the maintenance operations, included are wood and metal fabrication operations and a pump cleaning station. Process unit 3 contains the fabric heat set line (ES 573) located in building W018-1. It is a roll to roll operation that shrinks woven and nonwoven fabrics prior to chemical treatment. The line has a 2 zone process oven, zone one uses IR heat, zone 2 utilizes a natural gas burner. Natural gas combustion byproducts and process gases combine in the oven and exit building through emission point EP013. It is assumed that all emissions associated with heat setting of fabric results exclusively from the combustion of natural gas used to fire the oven burners. The emissions are considered to be exempt from the emission inventory. Process 4 and process 5 are vulcanizing pressing operations. The vulcanizing presses



are roll to roll operations that utilize pressure and heated platens to activate adhesives and cure chemical treatments. The 94" press (ES 107), located in building W018-1, utilizes a dedicated boiler (ES 9107-13) to heat its platens. The boiler (ES 9107-13) is natural gas fired and vents to the atmosphere through emission point EP011 and is considered to be exempt form emission inventory. The 64" press (108), located in building E006-0, has its platens heated by steam from the main boilers (ES 9123, ES 9250, ES 9290). The boilers are vented to the atmosphere through EP401, process related emissions vent to the atmosphere through EP107. The boilers are described and documented as emission unit 4. Emission unit 4 is considered exempt from emission inventory. Process unit 6 contains the sander-coater (ES 115). It is a continuous loop coating line, located in building W009-1. The line produces silicone rubber and polyvinylidene chloride (PVDC) latex treated fabric belting. The line is also used to heat set nylon fabric. The line consists of a stationary head roll, moveable tail stock and a sanding unit with a dust collector system. The sanding unit is used to abrade belt surfaces to achieve desired belt thickness and texture. Belting particles generated during the sanding operation are captured by the dust collection system. The sander-coater utilizes electric IR heater panels (86.4 kw total capacity) contained in a retractable exhaust hood to dry and cure coatings. The exhaust hood is connected to a blower that exits the east wall of building W009-1 and vents to the atmosphere through emission point EP136. The vast majority of emissions are water vapor from the drying of PVDC latex. Process unit 7 contains the buffer (ES 101) and is located in building E006-1. The line is a roll to roll sanding operation consisting of a sanding unit and a dust collector system. The dust collector empties to waste drums in building E006-0. The buffer is used to abrade belt surfaces to achieve desired thickness and texture. Emissions from the buffer are fugitive particles of belting material that have escaped the dust collection system. Currently (September 13,2000) engineering work to replace the waste drums used by the dust collector with a cartridge system is underway. Installation of the cartridge system is projected to be completed by January 2001. Process unit 8 is the fabric singer (ES118). It is roll to roll operation that utilizes an exposed natural gas burner to singe uncoated fabric surfaces. The unit is located in building W008-1. Natural gas combustion byproducts and process gases vent to the



outside atmosphere through EP129. Process unit 9 and process unit 10 are electrically heated walk-in ovens. Process unit 9 is located in building E006-1. The oven (ES 9188) is maintained at 115 F for warming of polyurethane. The polyurethane is warmed for viscosity control. The oven vents to the atmosphere through emi ssion point EP601. Polyurethane has a very small amount of volatiles if any, and emissions from ES9188 are assumed to be negligible. Process unit 10 is located in building W018-1. The oven (ES 110) is used to solidify scrape PVC left in fiber storage drum's after processing. The oven ducting exit the west wall of building W018-1 and vents to the atmosphere through emission point EP014. Emissions are similar in composition to TPL-A, which contain mainly VOC's. Process unit 11 contains the plant latex rubber storage tanks and mixing operations. It is located in building E006A-0 and E014-0. EU 3 has 11 process units. Process unit #1 is made up of 8 loom groups and corresponding emission points (group 1) including 28 general ventilation exhaust locations that ventilate the eight loom groups which also represent eight buildings that contain the looming operation. The loom groups 1-8 are representative of the 8 loom operation buildings. Each loom is considered an emission source. A table of description of emission unit 3 follows - an additional table explains the 11 process units in emission unit 3. Also included is additional information for process unit 1 which is also emission point group 1, which includes the eight loom groups (1-8). The information is presented in three sets of tables to provide: emission points/buildings/fan capacity, emission source operating hours, emission unit 3 - production. EU3 process units 2-11 are remaining misc.

Building(s): W018-1

Condition 1-3: Facility Permissible Emissions

Effective between the dates of 04/28/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 1-3.1:

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: 000108-88-3 (From Mod 1) PTE: 19,000 pounds per year



Name: TOLUENE

CAS No: 0NY100-00-0 (From Mod 1) PTE: 49,000 pounds per year

Name: HAP

CAS No: 0NY998-00-0 (From Mod 1) PTE: 99,000 pounds per year

Name: VOC

Condition 1-4: Capping Monitoring Condition

Effective between the dates of 04/28/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 1-4.1:

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:

6NYCRR 201-6.1

Item 1-4.2:

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

Item 1-4.3:

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 1-4.4:

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 1-4.5:

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 1-4.6:

The Compliance Demonstration activity will be performed for the Facility.

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



Item 1-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Total Volatile Organic Compound emissions as defined in 6 NYCRR part 200 is limited to less than 99000 pounds per year based on a 12 month rolling average. This is applicable to all the emission units described in this permit, 0001,0002 and 0003. Monthly totals as well as the rolling annual monthly average will be maintained and based upon msds sheets or equivalent for concentration and purchase records or equivalent for quantity. Emissions from emission unit 3 are exempt sources but VOC emissions from these sources are to be included. Emissions from the exempt boilers are assumed to be insignificant enough to not exceed the 1000 pound cushion.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 99000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 1-5: Capping Monitoring Condition

Effective between the dates of 04/28/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 1-5.1:

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:

6NYCRR 201-6.1

Item 1-5.2:

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



Item 1-5.3:

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 1-5.4:

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 1-5.5:

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 1-5.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Individual emissions of Hazardous Air Pollutants (HAP's) as defined in 6 NYCRR part 200 is limited to less than 19000 pounds per year based on a 12 month rolling average. (Toluene is listed as the example of a HAP that must be tracked. A complete list of individual HAPs is in part 200.) This is applicable to all the emission units described in this permit, 0001,0002 and 0003. Monthly totals as well as the rolling annual monthly average will be maintained and based upon msds sheets or equivalent for concentration and purchase records or equivalent for quantity. Emissions from emission unit 3 are exempt sources but HAP emissions from these sources are to be included. Emissions from the exempt boilers are assumed to be insignificant enough to not exceed the 1000 pound cushion.



Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: CONCENTRATION Upper Permit Limit: 19000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 1-6: Capping Monitoring Condition

Effective between the dates of 04/28/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 1-6.1:

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:

6NYCRR 201-6.1

Item 1-6.2:

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

Item 1-6.3:

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 1-6.4:

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 1-6.5:

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 1-6.6:

The Compliance Demonstration activity will be performed for the Facility.



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

Item 1-6.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Emissions of Total Hazardous Air Pollutants (HAP's) as defined in 6 NYCRR part 200 is limited to less than 49000 pounds per year based on a 12 month rolling average. This is applicable to all the emission units described in this permit, 0001,0002 and 0003. Monthly totals as well as the rolling annual monthly average will be maintained and based upon msds sheets or equivalent for concentration and purchase records or equivalent for quantity. Emissions from emission unit 3 are exempt sources but HAP emissions from these sources are to be included. Emissions from the exempt boilers are assumed to be insignificant enough to not exceed the 1000 pound cushion.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: CONCENTRATION Upper Permit Limit: 49000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 1-7: Capping Monitoring Condition

Effective between the dates of 04/28/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 1-7.1:

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:

6NYCRR 201-6.1



Item 1-7.2:

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

Item 1-7.3:

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 1-7.4:

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 1-7.5:

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 1-7.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-7.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility is "Capped out" of the requirements of a Title V permit as allowed under this section of part 201. The Facility potential to emit Total Volatile Organic Compounds (VOC's), Total Hazardous Air Pollutants (HAP's), and individual HAP's shall be limited to less than the title V applicability thresholds of 50, 25 and 10 tons per year respectively. The owner or operator of any facility subject to this section must maintain all required records on site for a period of 5 years and make them available to representatives of the department upon request. On an annual basis, 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 those threshold levels that would require the submission of an application for a Title V permit, or compliance with an applicable requirement.

The emission of pollutants in exceedance of the applicability thresholds for obtaining a title V facility permit or other applicable requirement constitutes a violation of this part and of the Act. Specific monitoring details are specified elsewhere in this permit.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 29: Air pollution prohibited

Effective between the dates of 08/06/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 29.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

**** Emission Unit Level ****

Condition 30: Process Definition By Emission Unit

Effective between the dates of 08/06/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 30.1(From Mod 1):

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

Emission Unit: 0-00001

Process: TPA Source Classification Code: 4-02-042-30



Process Description:

Process TPA code: thermoplastic a process - see attached separate sheet and block diagram for TPL-A, PVC plastisol compounds applied to obtain coated fabrics after coating the product is dryed, emissions are VOC's.

Emission Source/Control: OTPLA - Process

Item 30.2(From Mod 1):

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

Emission Unit: 0-00001

Process: TPB Source Classification Code: 4-02-042-30

Process Description:

Process TPB code: thermoplastic a process - see attached separate sheet and block diagram for TPL-B, PVC plastisol compounds applied to obtain coated fabrics after coating

the product is dryed, emissions are VOC's.

Emission Source/Control: 0TPLB - Process

Item 30.3(From Mod 1):

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

Emission Unit: 0-00002

Process: MPC Source Classification Code: 4-02-042-40

Process Description:

Process MLC, MPL-c, code: multipurpose - C (MPC) process, see attached separate sheet and block diagram for MPL-C. Multifunction process line MPL-C. Latex rubber, silicon rubber, polyurethane compounds applied to obtain coated fabrics after coating the product is dryed (natural gas),

emissions are water vapor and some VOC.

Emission Source/Control: 00106 - Process

Emission Source/Control: 10609 - Process

Emission Source/Control: 10621 - Process

Emission Source/Control: 10622 - Process

Emission Source/Control: 10658 - Process

Emission Source/Control: 10659 - Process

Emission Source/Control: 10666 - Process

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Emission Source/Control: 10667 - Process

Item 30.4(From Mod 1):

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

Emission Unit: 0-00003

Process: PU1 Source Classification Code: 3-30-004-99

Process Description:

Pu1 is associated with fabric processing utilizing looms for weaving and punching. emissions are particulates and

exhaust through building general ventilation.

Emission Source/Control: 00PU1 - Process

Emission Source/Control: 00PUX - Process

Item 30.5(From Mod 1):

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

Emission Unit: 0-00003

Process: PUX Source Classification Code: 3-30-001-98

Process Description:

PUX is the balance of exempt activities at the facility including minor spot cleaning of fabric with methylene chloride, sander coater utilizing silicone and latex materials, two walk in ovens electrically heated used to solidify coating raw material compounds remaining in totes. Total VOC emitted from these exempt activities are totaled monthly and used in determining the rolling 12 month average for compliance.

Emission Source/Control: 00PUX - Process