



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 9-1402-00773/00006  
Effective Date: 01/28/2015 Expiration Date: 01/27/2020

Permit Issued To:ENGINEERED COMPOSITES INC  
55 ROBERTS RD  
BUFFALO, NY 14206

Contact: ROMAN BOLUBUSH  
ENGINEERED COMPOSITES INC  
55 ROBERTS RD  
BUFFALO, NY 14206  
(716) 362-0295

Facility: ENGINEERED COMPOSITES INC  
55 ROBERTS AVE  
BUFFALO, NY 14206

Contact: ROMAN BOLUBUSH  
FIBRERIGHT MANUFACTURING CORP  
55 ROBERTS RD  
BUFFALO, NY 14206  
(716) 362-0295

Description:

**Engineered Composites, Inc.**  
**ATV Permit ID 9-1402-00773/00006**

Engineered Composites, Inc. (ECI) produces fiberglass reinforced plastic parts by closed molding processes. The Standard Industrial Classification Code for this facility is 3089 - Plastic Products, Not Elsewhere Classified. The Facility is located in a potential environmental justice area. Until now, ECI has operated their facility under an Air State Facility permit with federally enforceable emission CAPs of 9.90 tpy and 24.5 tpy for individual and total hazardous air pollutant emissions, respectively. These CAPs were established to avoid the requirements of 6NYCRR201-6: Title V Permits and 40CFR63, Subpart WWWW- National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. The current closed molding processes include compression molding using liquid compression molding (LCM), sheet molding compound (SMC) and resin transfer (vacuum infusion) molding. LCM and RTM are prepared onsite. Most of the SMC used is purchased, but it may also be produced onsite using an SMC machine. ECI also operates mixing tanks, grinders, a packaging line, storage rooms and conducts maintenance activities. Facility emissions from these processes and activities consist of particulates, hazardous air pollutants (HAPs), and volatile organic compounds (VOCs). Particulate emissions are controlled at each exhaust stack. Emissions of volatile HAPs and VOCs from the facility are not controlled



This initial title V permit will result in the elimination of the existing federally enforceable emission CAPs of 9.90 tpy and 24.5 tpy for individual and total hazardous air pollutant emissions, respectively and the addition of a federally enforceable emissions cap of 49.0 tpy VOCs that will allow ECI to avoid the requirements of 6NYCRR212.10 Reasonably available control technology for major facilities and 6NYCRR Subpart 231-5: New Major Facilities And Modifications To Existing Non-Major Facilities In Nonattainment Areas, and Attainment Areas of the State within the Ozone Transport Region. This Title V permit includes the addition of a coating line for manual and spray application of 2-part coatings, an open molding process for the manual application of resin, two emission points, an SMC maturation storage tank, the installation of two mixing tanks for molding compounds, and the addition of bulk molding compound (BMC) and glass mat thermoplastic (GMT) composite for use in the LCM press (BMC), SMC press (BMC and GMT) and sample press (BMC and GMT). BMC and GMT are purchased ready-to-use from a vendor. The addition of these processes and increased demand for current products will result in an increase in emissions that will require a Title V permit and fulfillment of environmental justice requirements.

ECI has one emissions unit, B-00001, which contains ten processes, thirty-nine emission sources and sixteen emission source controls. This emission unit has twelve emission points that exhaust emissions from sources both directly and indirectly through general ventilation. To ensure proper dispersion of air contaminants, the height of the exhaust stacks range from 93 ft -102 ft above the ground and have flowrates that range from 4500 actual cubic feet per minute (ACFM) to 50,000ACFM, with a total flowrate of 278,516 ACFM. The significant emission sources within B-00001 are the closed compression molding processes using LCM, SMC, BMC, and GMT, the RTM presses, mixing tanks for LCM, SMC and RTM, an SMC machine, and open molding of RTM. These sources generate mostly styrene emissions, a hazardous air pollutants (HAP), which constitutes the majority of emissions from the facility. All of the molding operations are now subject to the requirements of 40CFR63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. ECI also operates a coating line subject to the requirements of 6NYCRR228, Subpart 228-1 Surface Coating Processes and 40CFR63, Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. Anytime that the multicomponent coating containing diisocyanate compounds is applied using a spray gun, ECI must conduct the application in a spray booth under negative pressure. In accordance with 6NYCRR212.9(b), for emission rates between 1 and 10 lbs/hr, ECI must use a high efficiency (99%) filter on the exhaust capable of capturing particles with diameters of 2.5 um -10 um. For emission rates less than 1 lb/hr, ECI must show through an acceptable air quality analysis that diisocyanate emissions meet the respective NYSDEC annual guideline concentration (AGC) and short-term guideline concentration (SGC). This same approach applies to coatings that contain isocyanate compounds. The emission of particulates at all emission points are subject to the 0.050 gr/dscf limit specified under 6NYCRR212.4(c). Particulate emissions are controlled at all emission points and some presses with 99.7%, 98.1% or 92.4% efficient filters. All emission points at ECI are subject to 6NYCRR212.6(a) which limits the average opacity of the emissions during any six consecutive minutes to less than 20%. The packaging line is subject to the requirements of 6NYCRR228, Subpart 228-2 Commercial and industrial Adhesives, Sealants and Primers. In accordance with capping requirements specified under 6NYCRR210-7, ECI must calculate emissions on a monthly basis to verify continuous compliance with the 49.0 tpy VOC CAP and submit a summary of these emissions with a compliance certification, annually. To ensure compliance with 6NYCRR211.1 Pollution Prohibited, ECI must maintain Building B-001 as a total enclosure, under negative pressure, to capture fugitive



emissions in accordance with USEPA Reference Method 204. In accordance with 6NYCRR201-6.5(f)(1), this title V permit includes a monitoring condition specifying operational flexibility which allows ECI to carry out minor changes without modifying their title V permit. Those changes are reviewed and approved by NYSDEC and added to the Title V permit during the next modification or permit renewal. In accordance with this Title V permit, ECI is required to comply with all special operating/monitoring conditions, recordkeeping and reporting requirements to verify compliance. The facility is currently in compliance with all requirements.

This Title V permit contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission units, emission points, processes, emission sources and emission source controls. Appendix A contains a list of exempt activities as defined by 6NYCRR 201-3.2 and Appendix B contains ECI's Method 204 Operating Plan.

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  
  DIVISION OF ENVIRONMENTAL PERMITS  
  270 MICHIGAN AVE  
  BUFFALO, NY 14203-2915

Authorized Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



**DEC GENERAL CONDITIONS**

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

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

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

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

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

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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



submitted prior to actual transfer of ownership.

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

**Item 4.1:**

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

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

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

**Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

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

NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-1402-00773/00006

Facility DEC ID: 9140200773



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To:ENGINEERED COMPOSITES INC  
55 ROBERTS RD  
BUFFALO, NY 14206

Facility: ENGINEERED COMPOSITES INC  
55 ROBERTS AVE  
BUFFALO, NY 14206

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

Permit Effective Date: 01/28/2015

Permit Expiration Date: 01/27/2020





## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 23 6 NYCRR 201-6.4 (f): Compliance Certification
- 24 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- \*25 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 26 6 NYCRR 211.1: Air pollution prohibited
- 27 6 NYCRR 211.1: Compliance Certification
- 28 6 NYCRR 211.1: Compliance Certification
- 29 6 NYCRR 212.4 (c): Compliance Certification
- 30 6 NYCRR 212.6 (a): Compliance Certification
- 31 6 NYCRR 212.9: Compliance Certification
- 32 6 NYCRR 212.9 (b): Compliance Certification
- 33 6 NYCRR 212.9 (b): Compliance Certification
- 34 6 NYCRR 228-1.3 (e) (2): Compliance Certification
- 35 6 NYCRR 228-1.6 (a): Compliance Certification
- 36 6 NYCRR 228-2.7 (a): Compliance Certification
- 37 6 NYCRR 228-2.7 (b): Compliance Certification
- 38 40CFR 63, Subpart PPPP: Compliance Certification
- 39 40CFR 63, Subpart WWWW: Compliance Certification

#### Emission Unit Level

- 40 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 41 6 NYCRR Subpart 201-6: Process Definition By Emission Unit



**EU=B-00001**

- 42 40CFR 63, Subpart A: NESHAP General Provisions
- 43 40CFR 63.5790, Subpart WWWW: Operations included in an affected source
- 44 40CFR 63.5800, Subpart WWWW: Compliance date for new area sources
- 45 40CFR 63.5805, Subpart WWWW: Compliance Certification
- 46 40CFR 63.5805, Subpart WWWW: Compliance Certification
- 47 40CFR 63.5810, Subpart WWWW: General condition for open molding and centrifugal casting operations
- 48 40CFR 63.5835, Subpart WWWW: Compliance Certification
- 49 40CFR 63.5895(c), Subpart WWWW: Compliance Certification
- 50 40CFR 63.5895(d), Subpart WWWW: Compliance Certification
- 51 40CFR 63.5900, Subpart WWWW: 5900(a)(4) - Continuous compliance with work practice standards
- 52 40CFR 63.5900, Subpart WWWW: 5900(b) - Deviation reports
- 53 40CFR 63.5900, Subpart WWWW: 5900(c) - Limits and standards apply at all times except during S/S/M
- 54 40CFR 63.5900, Subpart WWWW: 5900(e) - Records to show that deviations are not violations
- 55 40CFR 63.5900, Subpart WWWW: Compliance Certification
- 56 40CFR 63.5905, Subpart WWWW: Compliance Certification
- 57 40CFR 63.5910(a), Subpart WWWW: Reports listed in table 14
- 58 40CFR 63.5910(b), Subpart WWWW: Schedule for semiannual reports
- 59 40CFR 63.5910(c), Subpart WWWW: Contents of semiannual reports
- 60 40CFR 63.5910(d), Subpart WWWW: Compliance Certification
- 61 40CFR 63.5910(f), Subpart WWWW: Exceedance of 100 tons/year threshold
- 62 40CFR 63.5910(g), Subpart WWWW: Reporting of deviations with semiannual title V reports
- 63 40CFR 63.5910(i), Subpart WWWW: Notification of change in compliance option
- 64 40CFR 63.5915, Subpart WWWW: Compliance Certification
- 65 40CFR 63.5915, Subpart WWWW: Compliance Certification
- 66 40CFR 63.5915, Subpart WWWW: Compliance Certification
- 67 40CFR 63.5920, Subpart WWWW: Record retention : 5920(a)-(d)
- 68 40CFR 63.5925, Subpart WWWW: General provisions

**EU=B-00001,Proc=CTG**

- 69 6 NYCRR 228-1.1 (a) (3): Once in always in
- 70 6 NYCRR 228-1.3 (b) (1): Compliance Certification
- 71 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 72 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 73 6 NYCRR 228-1.3 (e): Surface Coating- application requirements
- 74 6 NYCRR 228-1.4 (b) (5): Compliance Certification
- 75 6 NYCRR 228-1.6 (a): Compliance Certification
- 76 40CFR 63.4490(a)(1), Subpart PPPP: Compliance Certification
- 77 40CFR 63.4500(a)(1), Subpart PPPP: General requirements for compliant coatings and emission rate without add-on control devices
- 78 40CFR 63.4500(b), Subpart PPPP: Operation of affected source
- 79 40CFR 63.4510(b), Subpart PPPP: Compliance Certification
- 80 40CFR 63.4510(c), Subpart PPPP: Compliance Certification
- 81 40CFR 63.4520(a), Subpart PPPP: Compliance Certification
- 82 40CFR 63.4520(a), Subpart PPPP: Compliance Certification
- 83 40CFR 63.4520(a), Subpart PPPP: Compliance Certification



- 84 40CFR 63.4530(a), Subpart PPPP: Compliance Certification
- 85 40CFR 63.4530(b), Subpart PPPP: Compliance Certification
- 86 40CFR 63.4530(c), Subpart PPPP: Compliance Certification
- 87 40CFR 63.4530(c), Subpart PPPP: Compliance Certification
- 88 40CFR 63.4530(c), Subpart PPPP: Compliance Certification
- 89 40CFR 63.4530(d), Subpart PPPP: Compliance Certification
- 90 40CFR 63.4530(e), Subpart PPPP: Compliance Certification
- 91 40CFR 63.4530(f), Subpart PPPP: Compliance Certification
- 92 40CFR 63.4530(g), Subpart PPPP: Compliance Certification
- 93 40CFR 63.4530(h), Subpart PPPP: Compliance Certification
- 94 40CFR 63.4551, Subpart PPPP: Compliance Certification
- 95 40CFR 63.4551(h), Subpart PPPP: Compliance Certification
- 96 40CFR 63.4552, Subpart PPPP: Compliance Certification

**EU=B-00001,Proc=CTG,ES=CTG01**

- 97 40CFR 63.4531, Subpart PPPP: Maintenance of records
- 98 40CFR 63.4540, Subpart PPPP: Compliance Certification
- 99 40CFR 63.4541, Subpart PPPP: Compliance Certification
- 100 40CFR 63.4542, Subpart PPPP: Compliance Certification
- 101 40CFR 63.4550, Subpart PPPP: Compliance Certification
- 102 6 NYCRR 228-2.4 (a): Compliance Certification
- 103 6 NYCRR 228-2.4 (b) (1): Compliance Certification
- 104 6 NYCRR 228-2.4 (b) (3): Compliance Certification

**EU=B-00001,Proc=PKG**

- 105 6 NYCRR 228-2.4 (b) (4) (i): Cleanup of spray application equipment in an enclosed cleaning system
- 106 6 NYCRR 228-2.4 (b) (4) (ii): Compliance Certification
- 107 6 NYCRR 228-2.4 (b) (4) (iii): Compliance Certification
- 108 6 NYCRR 228-2.4 (d): Compliance Certification
- 109 6 NYCRR 228-2.5 (a): Compliance Certification
- 110 6 NYCRR 228-2.5 (c): Compliance Certification

**EU=B-00001,EP=C0001,Proc=CTG**

- 111 6 NYCRR 228-1.6 (c): Surface coating access for sampling

**EU=B-00001,EP=GV012,Proc=CTG**

- 112 6 NYCRR 228-1.3 (a): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 113 ECL 19-0301: Contaminant List
- 114 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 115 6 NYCRR 201-3.1 (b): Compliance Demonstration
- 116 6 NYCRR 201-3.1 (c): Compliance Demonstration
- 117 6 NYCRR 201-3.1 (d): Compliance Demonstration

NOTE: \* preceding the condition number indicates capping.



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

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

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

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

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

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

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

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

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

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

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

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

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



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

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

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

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

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

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

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

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

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



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

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

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

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**Item L: 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 M: Federally Enforceable Requirements - 40 CFR 70.6 (b)**  
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

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

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

**Condition 1: Acceptable Ambient Air Quality**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 200.6**

**Item 1.1:**  
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Condition 2: Fees**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)**

**Item 2.1:**  
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 3: Recordkeeping and Reporting of Compliance Monitoring**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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





**Item 3.1:**

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

**Condition 4: Records of Monitoring, Sampling, and Measurement  
Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (2)**

**Item 4.1:**

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**Condition 5: Compliance Certification  
Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



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

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

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill



Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

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



Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 6: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
  - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters.

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The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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

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

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
NYSDEC Region 9 Headquarters  
270 Michigan Avenue  
Buffalo, NY 14203-2915

The address for the BQA is as follows:

NYSDEC  
Bureau of Quality Assurance  
625 Broadway  
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 202-2.1**

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

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**Item 7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements  
Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 202-2.5**

**Item 8.1:**

(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

**Condition 9: Open Fires - Prohibitions  
Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 9.1:**

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

**Item 9.2**

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

(a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.

(b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.



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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.**

**[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]**

**Condition 10: Maintenance of Equipment  
Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 6 NYCRR 200.7**

**Item 10.1:**

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



effectively.

**Condition 11: Recycling and Salvage**  
Effective between the dates of 01/28/2015 and 01/27/2020

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Item 11.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**  
Effective between the dates of 01/28/2015 and 01/27/2020

**Applicable Federal Requirement:6 NYCRR 201-1.8**

**Item 12.1:**

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.

**Condition 13: Exempt Sources - Proof of Eligibility**  
Effective between the dates of 01/28/2015 and 01/27/2020

**Applicable Federal Requirement:6 NYCRR 201-3.2 (a)**

**Item 13.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

**Condition 14: Trivial Sources - Proof of Eligibility**  
Effective between the dates of 01/28/2015 and 01/27/2020

**Applicable Federal Requirement:6 NYCRR 201-3.3 (a)**

**Item 14.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

**Condition 15: Requirement to Provide Information**  
Effective between the dates of 01/28/2015 and 01/27/2020

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





**Item 15.1:**

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 16: Right to Inspect**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)**

**Item 16.1:**

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Condition 17: Off Permit Changes**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 17.1:**

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

(i) For each such change, the written notification required above shall include a brief description

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of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

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

**Condition 18: Required Emissions Tests**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 18.1:**

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

**Condition 19: Accidental release provisions.**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 19.1:**

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

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
  - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

**Condition 20: Recycling and Emissions Reduction**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 20.1:**



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

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

**Condition 21: Emission Unit Definition**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 21.1:**

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

Emission Unit: B-00001

Emission Unit Description:

This emission unit consists of all fiberglass reinforced plastic (FRP) part manufacturing processes and associated activities contained in Building B-001. The processes include, but are not limited to, sheet molding compound (SMC) production, closed compression molding using liquid compression molding (LCM), SMC, bulk molding compound (BMC), glass mat thermoplastic composite (GMT), resin transfer molding (RTM) using vacuum infusion, mixing of LCM, RTM and SMC compounds, SMC maturation, open molding (manual), coating (manual and spray applied), cutting FRP, powder coating, finish grinding FRP, drilling FRP, spray application of adhesives and sealants, packaging of finished plastic parts, cleaning/ maintenance activities, storage, etc. Each LCM press is operated in a booth under negative pressure to capture volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the molding process and particulates from flash cutting and powder coating of molded plastic parts. Particulate emissions are controlled with polyester filters at each press. Emissions from all of the LCM presses are exhausted through one stack, Emission Point (EP) C0001. All of the LCM presses may also be used with BMC. Emissions from the SMC, RTM and sample presses, SMC machine, mixing tanks, open molding, RTM panel grinding, storage, and the finishing/packaging line are fugitive and are exhausted through general ventilation stacks (EPs G0004, GV007 – GV013). The SMC presses and the sample press may also be used with BMC and GMT. The general ventilation exhaust stacks have polyester filters (Emission Source Controls GC004, GVC07-GVC13) in place to capture fugitive particulates. Particulates generated by grinding operations at ES G0001-G0003 are exhausted through EP G0001-G0003, which are equipped with accordion paper filters (GC001-GC003) to control emissions of particulates. Grinding sources ES G0005 and ES G0006



are each equipped with spun bond polyester cartridge filters (GC005 and GC006) to capture particulates (inside exhaust vented to the atmosphere through GV013). The spray paint booth used for coating operations, Process CTG, is equipped with a dedicated exhaust system with appropriate filters for particulate control. This system is ducted into EP GV012. Emissions of volatile compounds are uncontrolled. Building B-001 is used as a permanent total enclosure (PTE) in accordance with USEPA Reference Method 204 to minimize the release of fugitive emissions through doors, windows and other building apertures.

Building(s): B001

**Condition 22: Progress Reports Due Semiannually**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 22.1:**

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

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

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

**Condition 23: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 23.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 23.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

I. Protocol Objective

The objective of this condition is to maximize operational flexibility at the facility by building into the Title V permit the capability to make certain changes using a



protocol. As provided under 6 NYCRR Part 201-6.4(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.6.

## II. Protocol

### A. Criteria

1. Changes reviewed under this protocol shall be evaluated in accordance with the following criteria:

a. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

b. Any new or changed emission source shall not be part of a source project that results in a significant net emissions increase that exceeds the New Source Review (NSR) thresholds identified in 6 NYCRR Part 231.

c. The facility shall not use the protocol to make physical changes or changes in the method of operation of existing emissions sources that would require a new or modified federally enforceable cap either to avoid major NSR requirements or to address and comply with other Clean Air Act requirements, such as RACT. Such changes must be addressed via the significant permit modification provisions.

### B. Notification Requirements for Changes Reviewed under the Protocol

1. The facility shall notify the Department in writing of the proposed change.

2. Notifications made in accordance with this protocol will include the following documentation:

a. Identification of the Title V permit emission unit, process(es), emission sources and emission points affected by the proposed change with applicable revisions to the Emission Unit structure;

b. Description of the proposed change, including operating parameters;



- c. Identification and description of emissions control technology;
- d. Documentation of the project's, or emission source's, compliance with respect to all state and/or federally applicable requirements, including the following steps:
  - i. Calculate the emission rate potential and maximum projected actual annual emission rates for all contaminants affected by the change.
  - ii. Submit documentation of major NSR program non-applicability for NYSDEC review and approval.
  - iii. Identify and evaluate the applicability of all regulations likely to be triggered by the new or changed emission source.
  - iv. Propose any operating and record keeping procedures necessary to ensure compliance.
- e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.

#### C. Review and Approval of Changes

1. The Department shall respond to the permittee in writing with a determination within 15 days of receipt of the notification of the permittee.
2. The Department may require a permit modification, in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to notification do not meet the criteria under II. A above or that the changes may have a significant air quality impact or be otherwise potentially significant under SEQRA (6 NYCRR Part 617).
3. The Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.

#### D. Additional Compliance Obligations for Changes Made Under this Protocol

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1. Upon commencement of the change, the facility shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with II.A.1.a above.

2. The facility shall provide with the semi-annual monitoring report, a summary of the changes made in accordance with this protocol and a statement of the compliance status of each. Changes reported should include all those made during the corresponding period and any earlier changes that have not yet been incorporated into the permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 24: Facility Permissible Emissions**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 24.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0

PTE: 98,000 pounds per year

Name: VOC

**Condition 25: Capping Monitoring Condition**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 25.1:**

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

6 NYCRR 212.10

6 NYCRR Subpart 231-5

**Item 25.2:**

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

**Item 25.3:**







Facility-wide actual emissions of VOCs shall not exceed 49.0 tpy, as determined by summing the monthly VOC emissions during any consecutive 12-month period from all VOC contributing activities. Emissions shall be determined as follows or in another manner acceptable to NYSDEC:

$$\text{Monthly Total VOCs (lbs/mo)} = \text{ER1} + \text{ER2} + \text{ER3} + \text{ER4} + \text{ER5} + \text{ER6} + \text{ER7} + \text{ER8} + \text{ER9} + \text{ER10}$$

Closed Compression Molding Process P01 and the Sample Press (ES Sampl) using poured (not spread) Liquid Compression Molding (LCM) paste (resin + fillers, additives):

The LCM emission factor is the average of LCM test results for individual poured LCM test runs, expressed as the percentage of the styrene weight in the LCM paste processed in the compression mold. Monthly emissions from poured LCM (ER1) may be determined using the emission factor of 0.645 weight % of starting styrene monomer emitted as follows:

$$\text{ER1} = 0.00645 * \text{SUM} [(\text{LCM styrenated resin usage rate (lbs/mo)} * \text{styrene content, wt \%}/100)]$$

OR

Monthly emissions from poured LCM (ER1) may be determined using the following equations from ANSI/ACMA/ICPA UEF-1-2011a:

1) A paste factor must be determined for each LCM styrenated resin formulation:

$$\text{The LCM Poured Paste Factor (lbs styrene emitted / lb LCM paste prepared)} = (0.0022 * \% \text{ styrene}) + 0.0008$$

$$\text{Where \% styrene} = (\text{lbs LCM styrenated resin used in paste} * (\text{styrene content, wt \%}/100)) / (\text{lbs LCM paste prepared})$$

$$2) \text{ER1} = \text{SUM} [(\text{LCM Poured Paste Factor, lbs styrene emitted/lbs LCM paste prepared}) * (\text{lbs LCM paste prepared/mo})]$$

Note: The styrene and paste factors account for fugitive styrene emissions generated during charge preparation, including filling buckets with LCM charge, transfer of charge in open buckets to press, and pouring LCM charge into molding press. The material preparation times listed in the BMC/LCM Compression Molding Test Report ranged from 2.9-5.5 minutes for the poured LCM charges (#1, #2, #5 and #7).

Sheet Molding Compound (SMC) Process P02 and the Sample Press (ES SAMPL):



The emission factor for SMC is expressed as a percentage of the available styrene monomer contained in the uncured SMC material that is processed in the compression mold. Monthly styrene emissions from SMC may be determined using the emission factor of 1.5 weight % of starting styrene monomer emitted as follows:

$$ER2 = 0.015 * \text{SUM} [(SMC \text{ usage rate (lbs/mo)} * \text{styrene content, wt \% /100)]$$

Production of SMC (Process SMC):

Monthly styrene emissions from the SMC machine can be estimated from the following equations:

$$SMC \text{ Machine ER} = 0.1457 \text{ At} - 0.1454$$

where:

SMC Machine ER = VOCs emission rate, lb/hr, when paste is on the line

$$\text{At} = \text{Total wet area of SMC machine} = \text{Adl} + \text{Adu} + \text{W} * (\text{Ll} + \text{Lu})$$

Adl = open area of the lower doctor box, ft<sup>2</sup>

Adu = open area of the upper doctor box, ft<sup>2</sup>

W = wet width of SMC, ft

Ll = Lower wet length, ft

Lu = Upper wet length, ft

$$ER3 = \text{SMC Machine ER, lbs/hr} * \text{Hours of Operation, hrs/mo}$$

Resin Transfer Molding/ Vacuum Infusion Process

RTM:

Monthly emissions from RTM may be determined using an emission factor of 1.0 weight % of starting monomer emitted as follows:

$$ER4 = 0.01 * \text{SUM} [ (\text{RTM Resin usage rate (lbs/mo)} * \text{styrene Content, wt \% /100)]$$

Closed Compression Molding Processes P01 and P02 and the Sample Press (ES Sampl) using Bulk Molding Compound (BMC):

The emission factor for BMC is expressed as a percentage of the available styrene monomer contained in the uncured BMC material that is processed in the compression mold. Monthly styrene emissions from BMC compression molding (ER5) may be determined using the emission factor of 1.15% of the styrene monomer content (weight) in the processed BMC material as follows:

$$ER5 = 0.0115 * \text{SUM} [(BMC \text{ usage rate (lbs/mo)} * \text{styrene content, wt \% /100)]$$

Closed Compression Molding Process P02 and the Sample Press (ES Sampl) using Glass Mat Thermoplastic (GMT) Composite :



The emission factor for GMT is expressed as a percentage of VOC contained in the GMT material that is processed in the compression mold. Monthly VOC emissions from GMT compression molding (ER6) may be determined using the percent VOC by weight in the GMT material as follows:  
 $ER6 = \text{SUM} [(\text{GMT usage rate (lbs/mo)} * \text{VOC content, wt \%}/100)]$

Mixing Tanks (Process MIX):

Monthly VOCs emissions from the mixing process using open fill tanks shall be estimated using the emission factor of 0.25 weight % of starting styrene monomer emitted for mixing operations with closed or covered mixing vessels and no active ventilation of the mixing vessel as follows:

$$ER7 = 0.0025 * \text{SUM} [(\text{Resin used in mixing tanks (lb/mo)}) * (\text{styrene content, wt \%}/100)]$$

OR

If the method of filling the mixing tanks changes from "open fill" to "closed fill", ECI may use an alternative emission factor approved by NYSDEC.

Packaging (Process PKG), Solvents (thinners, cleaning materials, solvents, etc.), Coating (Process CTG) and unidentified VOC contributing activities, including Exempt and Trivial:

Monthly emission shall be calculated assuming 100% loss of VOCs contained in these products to the ambient air.

$$ER8 = \text{SUM} [(\text{adhesives/solvent/coatings/etc usage rate (lbs/mo)} * \text{VOC Content, wt \%}/100)]$$

Note: If appropriate, ECI may use alternative emission factors or estimation methods to determine ER8, subject to NYSDEC approval.

Manual Layup of RTM Resin (Process MNL):

$$\text{EF calc} = [((0.286 * \% \text{ Org HAP}) - 0.0529) * 2000] \text{ lb VOC emitted/ton resin applied}$$

$$ER9 = \text{EF calc, lb VOC emitted/ton resin applied} * \text{ton resin applied/mo}$$

SMC Maturation in Resin Mix Storage Tank, (Process MAT, ES MST01):

$$ER10 = \text{SMC Resin Mix Stored, tons/month} * 0.00175 \text{ lb styrene/tonSMC stored}$$

Note: Emission factors are from the following sources: a) ER1, ER2: SMC and BMC/LCM Compression Molding Test Reports by Engineering Environmental Consulting Services (August-September 2008); b) ER1, ER2, ER3 and ER5: ANSI/ACMA/ICPA UEF-1-2011a: Estimating Emission Factors



for Open Molding and Other Composite Processes; c) ER4: USEPA AP-42, Chapter 4, Section 4.4, Table 4.4-2: Closed Molding; d) ER7: Chapter 5 of Background Information Document (BID) for 40CFR63, Subpart WWWW, Section 5.3, Page 33; e) ER6 and ER8: mass balance and f) ER9: Table 1 to 40CFR63 Subpart WWWW, open molding operation/manual resin application/non-vapor suppressed resin for materials with 33% or greater organic HAP. Styrene content, wt % is the styrene content as supplied, plus any extra added by operator, but before the addition of other additives such as powders, fillers, glass, etc. The emission factors presented for styrene are based on stack test results for closed molding operations that used styrenated resins. ECI may be required to use an alternative emission factor approved by NYSDEC if a new product is used that does not contain styrene monomer.

The Facility shall keep and maintain records for each process and other VOC contributing activities to determine actual VOCs emissions based on verifiable data from all sources, including trivial and/or exempt activities (excluding combustion sources). These records shall include the following information:

- 1) A current list of all VOC containing products used throughout the facility including, but not limited to, resins, solvents, adhesives, sealants and other coatings. This list shall include information on the manufacturer, brand, product name and/or code; VOC content in grams per liter, pounds per gallon or percent by weight, density/specific gravity and any other pertinent physical/chemical properties; and/or manufacturer's product specifications, material content reports, or laboratory analyses providing this information;
- 2) A monthly log of the consumption of each product used that contains VOCs. If a paste factor is used to calculate ER1, in addition to VOC containing products, the facility must maintain a monthly log of the consumption of fillers, additives and other ingredients used to prepare LCM compound;
- 3) A daily log of the hours of operation for the SMC machine;
- 4) All purchase orders, invoices, usage and production records and other documents to support information in the monthly/daily logs; and
- 5) all calculations used to determine the monthly emissions.



Each calendar month, the facilitywide 12-month rolling total for VOC emissions shall be computed by adding the current monthly facilitywide VOC emissions to the facilitywide VOC emissions for the previous 11 months. In accordance with 6NYCRR201-3.1 and 6NYCRR201-2.1(b)(21), VOC emissions from exempt and trivial activities and fugitive emissions must be included in potential to emit calculations when determining whether an emission source is subject to Title V Facility permitting and/or New Source Review. Considering this, ECI must include these emissions in the 12-month rolling totals for VOC emissions. Since emissions from these sources at ECI may be low, an alternative approach may be taken to track 12-month rolling VOC totals for compliance verification. If VOC emissions from exempt and trivial activities and fugitive emissions, combined, are less than 4 tpy, then only the monthly VOC totals from all permitted emission sources and any emission sources added under Op-Flex need to be included in the 12-month rolling VOC totals. Instead of calculating monthly VOC emissions and 12-month rolling total VOCs from exempt and trivial activities and fugitive emissions, these VOC emissions may be calculated annually based on annual purchases or usage and emission factors accepted by NYSDEC. If during any calendar month the 12-month rolling total for VOCs from all permitted and Op-Flex emission sources equals 45.0 tpy, then monthly VOC emissions from exempt and trivial activities and fugitive emissions must be added to the 12-month rolling total of VOCs to demonstrate compliance with the 49.0 VOC CAP.

Within 30 days following each calendar year, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the 49.0 ton per year limit imposed by the emissions cap. This shall include a summary report which shall list the products used with reference to the associated process, the corresponding VOC contents, the quantities used monthly, emission factors used to calculate VOC emissions, the monthly VOC emissions and the monthly total, the rolling 12-month VOC emissions for each consecutive month of the period, a comparison to the 49.0 tpy limit and the annual total for VOCs from exempt, trivial and fugitive sources. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

To reduce unnecessary VOC emissions to the environment, Engineered Composites Inc. shall comply with the following handling, storage and disposal requirements for VOC containing compounds:



- (1) keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels and whenever vessels are filled with VOC containing material.
- (2) keep hopper and feed tank covers closed, except when adding materials or during maintenance/repair.
- (3) Any mixing tank, feed tank or hopper that ECI uses must be constructed and operated in a way that minimizes emissions. Mixing tank, feed tank and hopper covers shall be gasketed and secured with clamps, whenever possible. If it is not possible to use gaskets and clamps to secure covers, ECI shall ensure that covers fit securely, without gaps.
- (4) do not use open containers to store or dispose of cloth or paper impregnated with solvents that are used for surface preparation, cleanup, etc;
- (5) do not store spent or fresh solvents to be used for surface preparation, cleanup, etc. in open containers;
- (6) do not use open containers to store or dispense resins, molding compound, adhesives, solvents, coatings, etc. except when production, sampling, maintenance or inspection procedures require operational access; and
- (7) do not use open containers to store or dispose of resins, molding compounds, adhesives, solvents, coatings, etc.

An exceedance of the 49.0 tpy emission limit, failure to fulfill the recordkeeping and reporting requirements and/or failure to maintain the good work/housekeeping practices specified in this condition constitutes a violation of 6NYCRR212-10 and 6NYCRR231-5. Exceedance of this limit must be reported to the Department immediately via telephone during normal working hours, but no later than 2 business days after the occurrence. A written report shall be submitted to the Department within 30 days of the occurrence and shall include the cause of the exceedance, corrective action taken, contaminants emitted and an estimate of the emissions.

Parameter Monitored: VOC

Upper Permit Limit: 49.0 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 26: Air pollution prohibited**  
**Effective between the dates of 01/28/2015 and 01/27/2020**



**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 26.1:**

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

**Condition 27: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 27.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 000100-42-5 STYRENE

**Item 27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Engineered Composites Inc. (ECI) is located near a residential community who could be affected by offsite emissions of air contaminants. Styrene is the predominant contaminant emitted from operations at ECI. To determine the short-term and long-term impact of styrene on the neighborhood surrounding ECI, an ambient air quality impact analysis was performed using ECI's emission rate potential (ERP) for styrene and the US EPA AERMOD refined atmospheric dispersion modeling system. The ERP of styrene for Emission Points C0001, G0004, GV008, GV009, GV010 and GV012 was determined based on ECI's maximum operating capacity (all emission sources operating simultaneously at maximum design capacity). AERMOD results predict a maximum 1-hr ambient concentration of 320  $\mu\text{g}/\text{m}^3$  and a maximum annual ambient concentration of 30  $\mu\text{g}/\text{m}^3$ .

NYSDEC develops annual guideline concentrations (AGCs) for non-criteria air contaminants to protect the public health and the environment. AGCs protect the public from effects that may be associated with long-term exposure to a specific air contaminant. NYSDEC also establishes short-term guideline concentrations (SGCs) to preclude any significant health or environmental effects which might be associated with acute exposure to sources of air



contaminants. The NYSDEC AGC for styrene is 1000  $\mu\text{g}/\text{m}^3$ . The NYSDEC SGC for styrene is 17,000  $\mu\text{g}/\text{m}^3$ . When the offsite concentrations predicted by AERMOD are compared to the AGC and SGC for styrene, the cumulative potential ambient impact on public health associated with long-term and acute exposure to styrene are within the acceptable range.

The styrene odor threshold of 565  $\mu\text{g}/\text{m}^3$  was also used by NYSDEC to evaluate the short-term impact of styrene emissions from ECI. This value is the mean human odor threshold identified from styrene odor detection and recognition studies critiqued and accepted as valid by the US EPA (see Reference Guide to Odor Thresholds for Hazardous Air Pollutants Listed in the Clean Air Act Amendments of 1990, EPA/600/R-92/047). The 1-hour maximum ambient concentration of 320  $\mu\text{g}/\text{m}^3$  predicted by AERMOD is less than the odor threshold for styrene. If odor complaints are received by ECI and/or NYSDEC and the odor is confirmed to be caused by ECI's processes and/or related activities, ECI shall reduce styrene emissions to a level that results in an ambient concentration that does not cause objectionable odors offsite. Ambient concentrations (1-hour) must be verified using an air quality model acceptable to NYSDEC.

Any complaints received by ECI regarding emissions to the ambient air from facility operations or associated activities shall be recorded in a permanently bound logbook and reported to NYSDEC within 2 calendar days of occurrence. For each incident, ECI shall investigate the cause of the odor problem and take appropriate and timely corrective action. Details shall be provided to NYSDEC in a written report within 30 days of the complaint. All records shall be maintained onsite for a minimum of 5 years and shall be made available upon request by a NYSDEC and/or US EPA representative.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 28: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 6 NYCRR 211.1**

**Item 28.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000100-42-5      STYRENE





**Item 28.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The processes at Engineered Composites, Inc. (ECI) generate fugitive emissions, including styrene, n-hexane, VOCs and particulates, which are released to the ambient air through general ventilation stacks and building apertures. Due to styrene's low odor threshold and high vapor density, fugitive emissions have been a nuisance and health concern to residents in the surrounding neighborhood. To minimize ground level emissions and comply with 6NYCRR 211.1, "Air Pollution Prohibited" and 6NYCRR212.9(b), "General Process Emission Sources", ECI shall operate Building B-001 as a total enclosure to capture fugitive styrene emissions in accordance with USEPA Method 204 - Criteria for and Verification of a Permanent or Temporary Total Enclosure.

ECI submitted a Draft Method 204 Operation and Monitoring Plan (Method 204 O&M Plan) on September 6, 2011 specifying how the facility will be operated to minimize the release of fugitive emissions. The Draft Method 204 O&M Plan was approved by NYSDEC on March 12, 2012 (see letter from M. Ladiana, NYSDEC to D. Marszalkowski, ECI), with additional requirements/clarifications necessary to finalize the plan and fully demonstrate compliance. Natural Draft Openings (NDO) directing air flow into the building with a minimum average facial velocity of 200 fpm have been established and verified using a grid system for the Winter and Summer Modes of Operation. The Final Method 204 O&M Plan is part of the Air Title V permit.

Engineered Composite Inc. must operate the facility in accordance with the Final Method 204 O&M Plan at all times that molding, mixing, packaging, coating and other HAP/VOC emitting activities are conducted at the facility. All access doors and windows that are not NDOs shall be closed during routine operation of the processes. This does not mean that these doors and windows must be closed at all times, but that they must be closed any time that ECI is not actually moving parts, supplies, equipment, etc. through them. However, if an access door is used so often that it is almost always open, then it shall be considered an NDO.

Facility operators must be made aware of the requirements of the Method 204 O & M Plan. Each NDO must be identified and the position(s) of the openings that were verified



compliant must be clearly marked in the vicinity of the NDO. Building B-0001 shall be inspected daily to verify compliance with the operating requirements specified in the Final Method 204 O&M Plan. At least once during each shift when HAP emitting processes are operating, 1) the direction of the airflow through the active NDO(s) must be verified using streamers, smoke tubes, etc. and 2) the door position established for the NDO to comply with Method 204 must be confirmed for the active NDO. The daily inspections shall be recorded in a logbook and shall include date, time, observer's name, and a brief description of observations, including problems/corrective actions taken. If NDOs are not in use this should be recorded. If a problem is encountered that cannot be corrected immediately, the NDO must be closed until the problem is rectified. The logbook must be maintained onsite for at least 5 years and must be available for review upon request by NYSDEC. The measurement of average facial velocity for each NDO is required when the operating modes change to verify compliance with the minimum requirement. Anytime a change is made to the Method 204 O&M Plan, the modified plan must be submitted to NYSDEC for review and approval prior to changing procedures at the facility. ECI shall certify compliance with the Final Method 204 O&M Plan in their Annual Monitoring Report.

Parameter Monitored: FLOW RATE  
Lower Permit Limit: 200 feet per minute  
Reference Test Method: USEPA Method 204  
Monitoring Frequency: PER SHIFT  
Averaging Method: ARITHMETIC MEAN  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 29: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 29.1:**  
The Compliance Certification activity will be performed for the Facility.

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

**Item 29.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL



DEVICE PARAMETERS AS SURROGATE

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. To ensure compliance with this limit the facility shall conduct regular inspections of the particulate filters and maintain/replace filters in accordance with the manufacturer's specifications. Inspections/maintenance shall be recorded in a logbook for each emission point as follows: Date, time, name of staff person performing inspection/maintenance, results of inspection/ maintenance and, each time a filter is replaced, the make and model of the filter. Whenever a problem is discovered, a description of the problem, the cause and corrective action taken must also be recorded. To verify maintenance practices all purchase orders and invoices related to maintaining/replacing the particulate control equipment and the inspection/maintenance/repair logbook shall be kept onsite in a format acceptable to the Department. All records, including manufacturer's specifications and guarantees for the filter, must be readily available for review by NYSDEC representatives and must be kept onsite for a minimum of five years. The Department reserves the right to require the performance of a Method 5 emissions evaluation at any time.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 30: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 30.2:**

Compliance Certification shall include the following monitoring:



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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The monitoring procedure necessary to determine compliance with the opacity requirements under section 212.6(a) includes the following:

Engineered Composites Inc. (ECI) shall conduct a daily ground level scan of visible emissions from emission points or other sources of air pollution at the Facility during daylight hours while processes are in operation, except during adverse weather conditions (fog, rain, or snow) to monitor for unusual opacity conditions. If visible emissions above zero percent (0%) opacity are present, then ECI shall determine the cause and make the necessary correction and verify that the excess visible emissions problem has been corrected. If visible emissions greater than 0% continue to be present, ECI will immediately notify the Department and conduct a Method 9 assessment within 2 days to determine the degree of opacity. A synopsis of observations including the date, time of day, weather conditions, observer's name, whether any opacity was observed with the identification of the emission point(s) that had opacity, a completed visible emission observation form (if a Method 9 is conducted) and a description of any corrective action taken shall be recorded in a permanently bound log book or in electronic format at the facility. Inclement weather conditions shall be recorded for those days when observations are prohibited.

Visible emissions greater than 0% opacity are not necessarily indicative of an emission violation, but rather serve as a trigger for further investigation to determine compliance with the opacity limit. However, any time that the opacity is determined to meet or exceed the limits of section 212.6(a) using Method 9, the facility will be determined to be in violation, will remedy the problem, and will contact the Department within one (1) business day of performing the Method 9 analysis. The provisions of Part 201-1.4 shall apply.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

All records shall be maintained on-site and shall be



available for inspection by Department representatives upon request. Records shall be maintained for a period of at least five years.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: 9  
Monitoring Frequency: DAILY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 31: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 6 NYCRR 212.9**

**Item 31.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 000100-42-5 STYRENE

**Item 31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Based on NYSDEC's review of styrene emissions from all sources at Engineered Composites, Inc. (ECI), styrene has been assigned an environmental rating of "B", as defined in 6NYCRR212.9 (a), Table 1. The determination of the environmental rating of a contaminant takes into consideration its toxicity at the facility's emission rate potential (ERP); the proximity of residents and sensitive environmental receptors to the source; emission dispersion characteristics at or near the source; and the projected maximum cumulative impact from all facility emissions. As part of the review, ECI's ERP for styrene was modeled using the AERMOD refined atmospheric dispersion modeling system. The maximum 1-hour and maximum annual ambient concentrations predicted by AERMOD were 320 µg/m<sup>3</sup> and 30 µg/m<sup>3</sup>, respectively. NYSDEC develops short-term and annual guideline concentrations (SGCs and AGCs) for non-criteria air contaminants to protect the public health and environment. The SGC for styrene is 17,000 µg/m<sup>3</sup> and the AGC for styrene is 1000 µg/m<sup>3</sup>. When the offsite concentrations predicted by AERMOD are compared to the SGC



and AGC for styrene, the cumulative potential ambient impact on public health associated with long-term and acute exposure to styrene are within the acceptable range. However, if it is determined that styrene emissions from ECI are causing offsite odors or additional toxicological information becomes available that verifies serious adverse effects from styrene exposure, the environmental rating of styrene will be increased to "A". At that time ECI must take appropriate measures in accordance with 6NYCRR 212.9(b), Table 2 to reduce the hourly emission rate of styrene to a level that results in an ambient concentration that does not cause objectionable odors or otherwise negatively affect offsite receptors.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 32: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 6 NYCRR 212.9 (b)**

**Item 32.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 004098-71-9 ISOPHORONE DIISOCYANATE

**Item 32.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Whenever a coating that contains diisocyanate and/or isocyanate monomers is applied using an HVLP spray gun or other spray application equipment, it shall be assumed that 100 % of the monomer passes through the particulate filter to the outside atmosphere. Diisocyanates and isocyanates have been assigned an environmental rating of 'A' because their discharge may result in serious adverse short-term and/or chronic health effects on the general public and the environment. ECI shall meet the requirements for degree of cleaning specified in 6 NYCRR 212.9(b), Table 2 for A-rated contaminants. The emission



rate potentials (ERPs) and annual emissions of diisocyanate and/or isocyanate monomers shall be estimated using the maximum capacity of the HVLP gun or other application equipment based upon the highest content specified for each diisocyanate and/or isocyanate monomer by the coating manufacturer, coating density, and mixing ratio. Based on the ERPs determined, the contaminants may require either 99% degree of air cleaning for ERPs between 1-10 lb/hr or the degree of air cleaning specified by the Department for ERPs less than 1 lb/hr.

If the ERPs are less than 1 lb/hr, the ambient concentration of these contaminants shall be determined using accepted air quality models, such as AerScreen and AerMod. The results shall be compared to NYSDEC's current short-term and annual guideline concentrations (SGCs and AGCs) to determine the ambient concentrations of these contaminants. If the ambient concentrations exceed their respective SGC and/or AGC, ECI will be required to control emissions of diisocyanate monomers to a level that results in ambient concentrations that are less than the SGC and/or AGC, as applicable. If an AGC or SGC does not exist for a contaminant, NYSDEC will assign an interim AGC/SGC or a de minimus limit.

The facility shall submit emission evaluations with supporting documentation for any coating that contains diisocyanate and/or isocyanate monomers that is spray applied to demonstrate compliance with this requirement. Records shall be maintained to verify compliance, including but not limited to, coating purchase records, coating usage records, Material Safety Data Sheets, Technical/Product Data Sheets, application equipment operation manuals and manufacturer's specifications. These records shall be made available for NYSDEC review upon request and shall be kept onsite for a minimum of 5 years.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: COATING  
Parameter Monitored: ISOPHORONE DIISOCYANATE  
Lower Permit Limit: 99 percent reduction by weight  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 33: Compliance Certification**



Effective between the dates of 01/28/2015 and 01/27/2020

Applicable Federal Requirement:6 NYCRR 212.9 (b)

**Item 33.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Process: CTG

Emission Point: GV012

Emission Source: CTG02

Emission Unit: B-00001

Process: CTG

Emission Point: GV012

Emission Source: GVC12

Regulated Contaminant(s):

CAS No: 000541-02-6

DECAMETHYLCYCLOPENTASILOXANE

CAS No: 013463-67-7

TITANIUM DIOXIDE

CAS No: 025068-38-6

PHENOXY RESIN

CAS No: 002855-13-2

CYCLOHEXANEMETHANAMINE, 5-AMINO-1,3,3 TRIMEHYL

CAS No: 068609-97-2

OXIRANE, MONO[C12-14 ALKYOXY METHYL]

CAS No: 072259-73-5

HEXANEDIOIC ACID, POLYMER AND

5-ISOCYANATO-1-(ISOCYANATOME)...

CAS No: 054914-37-3

CYCLOHEXANEMETHANAMINE....

CAS No: 028182-81-2

DIISOCYANATE,1-6-HEXAMETHYLENE

**Item 33.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Engineered Composites Inc. (ECI) operates Process CTG, an air-dried coating line for the application of multi-component coatings to reinforced plastic parts. Process CTG contains Emission Source CTG02, which is the spray application of coatings using a high volume low pressure (HVLP) spray gun or other NYSDEC accepted spray equipment. If a flow coater is used to apply coating, it is considered spray equipment only if paint droplets and/or aerosols which can be entrained in ventilation airflow are generated during the coating process. ECI is permitted to operate Emission Source CTG02, only if the spray application of coatings is conducted in a properly designed, operated and controlled spray booth. During the spray application of coatings, the spray booth shall be operated under negative pressure (verified by a pressure gauge) with a particulate filtration system. The particulate filtration system shall have a minimum efficiency of 99% and be capable of capturing aerosols/particles generated. The particulate filters





shall cover the entire exhaust opening and shall be maintained to ensure maximum capture efficiency at all times.

Whenever coatings that contain polymeric diisocyanates and/or polymeric isocyanates are spray applied, a high efficiency filtration system capable of capturing particles with diameters between 2.5  $\mu\text{m}$  and 10  $\mu\text{m}$  shall be used. This particulate control device is required to comply with the degree of cleaning specified under 6NYCRR212.9(b) to minimize the adverse effects of exposure to fine polymeric diisocyanate and/or polymeric isocyanate aerosols and particulates. Spray application of coatings containing polymeric diisocyanate and/or polymeric isocyanate aerosols and particulates without the use of the booth, under adequate negative pressure, a high efficiency filtration system and spray application equipment acceptable to the Department is prohibited. Any change in this filtration system must be reviewed and approved by NYSDEC prior to modification.

The emission rate of aerosols/particulates shall be determined based on an overspray particle size distribution accepted by the Department, the fractional efficiency of the proposed filter supplied by the filter manufacturer, the maximum capacity of the HVLP gun, transfer efficiency of the spray gun/applicator based on manufacturer's specifications or accepted literature, the highest content specified for each contaminant by the coating manufacturer, coating density, and mixing ratios.

The ambient concentration of each contaminant shall be determined using accepted air quality models, such as AerScreen and AerMod. The modeling results shall be compared to NYSDEC's current short-term and annual guideline concentrations (SGCs and AGCs) to determine the ambient impact of these contaminants caused by the spray application of coatings. Any proposed filter that fails to meet the applicable SGC and/or AGC will be considered unacceptable by the Department and ECI shall be required to make changes to the coating process and/or control equipment to reduce emissions to acceptable levels. If an AGC or SGC does not exist for a contaminant, NYSDEC will assign an interim AGC/SGC or a de minimus limit.

All records of coating purchases, coating usage, Material Safety Data Sheets, Technical/Product Data Sheets, manufacturer's specifications/guarantees/test results/performance data for spray application equipment, filters and spray booth and any other pertinent



information used to verify compliance with this requirement shall be available for NYSDEC review upon request and shall be maintained onsite.

Engineered Composites shall use and maintain the spray booth and associated equipment, the application equipment and control equipment in accordance with manufacturer's specifications and shall fulfill the monitoring requirements specified below:

Operators of the paint spray booth must periodically monitor the booth and the accompanying particulate control device(s) by completing the following tasks on a weekly basis, at a minimum:

1) Inspect the spray booth emission point for evidence of paint fallout and/or the presence of visible emissions during the spraying process. The presence of visible emissions indicates that the emission sources may not be operating properly and may need servicing.

2) Inspect the spray booth's particulate control device for evidence that maintenance or replacement is needed and establish a strict replacement schedule. If the booth is equipped with a pressure gauge to monitor filter exhaustion, the manufacturer's specifications and recommendations shall be followed.

3) Record in an inspection logbook the following information: Date, time, name of staff person performing inspection/maintenance and the results for each inspection/maintenance procedure; and, whenever a problem is discovered, a description of the problem, cause and the corrective action taken. Regardless of when a problem is noted, i.e. at a time other than during the weekly inspection, it must be remedied immediately. To verify maintenance practices all purchase orders and invoices related to maintaining the spray booth, the HVLP spray gun and the control equipment and the maintenance/repair logbook shall be kept onsite and be readily available for review by representatives from NYSDEC upon request. All records shall be kept onsite for a minimum of five years.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Lower Permit Limit: 99 percent reduction by weight

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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



**Condition 34: Compliance Certification**  
Effective between the dates of 01/28/2015 and 01/27/2020

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

**Item 34.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 34.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 35: Compliance Certification**  
Effective between the dates of 01/28/2015 and 01/27/2020

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

**Item 35.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the coating supplier/manufacturer fails to provide ECI with acceptable manufacturer's formulation data and certification which lists the parameters used to determine



the actual VOC content of each as applied coating subject to the VOC content limits specified in 6NYCRR228-1, ECI shall test the coating, as applied, in accordance with test methods specified in 228-1.6. If ECI conducts a test to determine VOC content of an as applied coating, testing and a subsequent compliance demonstration shall be conducted prior to using the product. The test results and compliance demonstration shall be submitted to the Department within 30 days of conducting the test. All records shall be available for NYSDEC review upon request and shall be maintained onsite for a minimum of 5 years.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 36: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 228-2.7 (a)**

**Item 36.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001  
Process: PKG

Emission Unit: B-00001  
Process: RTM

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

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any commercial or industrial adhesive, sealant, adhesive primer or sealant primer subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) that ECI purchases for use shall contain the following information on the container or label:

(1) a statement of the manufacturer's recommendation regarding thinning, reducing or mixing, provided:



(i) a statement is not required for thinning, reducing or mixing with water; and

(ii) if thinning prior to use is not necessary, the recommendation shall specify that the product is to be applied as supplied;

(2) the maximum or the actual VOC content as supplied, displayed in grams of VOC per liter of product; and

(3) the maximum or the actual VOC content as applied in accordance with the manufacturer's recommendation regarding thinning, reducing or mixing, displayed in grams of VOC per liter of applied product.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 37: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 228-2.7 (b)**

**Item 37.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Process: PKG

Emission Unit: B-00001

Process: RTM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 37.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The manufacturer of any commercial or industrial adhesive, sealant, adhesive primer or sealant primer subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) that ECI purchases for use shall provide calculated VOC content using the manufacturer's formulation data or determined using the calculations, procedures and test



methods in 6 NYCRR Part 228-2.6. If the manufacturer fails to provide adequate or acceptable information regarding VOC content for a product, ECI shall contact the manufacturer and request a certified statement with the test method (see 228-2.6 for acceptable methods) used to determine the VOC content and the results of the analysis or the calculated VOC content. Otherwise, ECI shall test the adhesive, sealant, adhesive primer or sealant primer, as applied, in accordance with test methods specified in 228-2.6. If ECI conducts the test to determine VOC content of any commercial or industrial adhesive, sealant, adhesive primer or sealant primer purchased, testing and a subsequent compliance demonstration shall be conducted prior to using the product. The test results and compliance demonstration shall be submitted to the Department within 30 days of conducting the test. All records shall be available for NYSDEC review upon request and shall be maintained onsite for a minimum of 5 years.

Reference Test Method: As specified in 6NYCRR228-2.6

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 38: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63, Subpart PPPP**

**Item 38.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for plastic parts and products surface coating facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations. Engineered Composites Inc. operates a coating operation for the surface coating of plastic parts as defined under 40CFR63.4481(a). This affected facility is subject to the applicable provisions of 40 CFR 63 Subpart PPPP. Engineered Composites Inc is responsible for complying with all applicable technical, administrative and reporting requirements specified in 40 CFR 63 Subpart PPPP.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 39: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63, Subpart WWWW**

**Item 39.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000100-42-5 STYRENE

**Item 39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This Subpart establishes national emissions standards for hazardous air pollutants (HAPs) and requirements to demonstrate initial and continuous compliance with these standards for reinforced plastic composites production at facilities that exceed the major source threshold for HAPs. Reinforced plastic composites production is limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production

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also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

Engineered Composites Inc (ECI) owns and operates a reinforced plastic composites production facility, located at a major source of HAPs and is therefore subject to all applicable requirements of 40CFR63 Subpart WWWW. In accordance with 40CFR63.5795, ECI operates new affected sources. ECI is responsible for complying with all applicable technical, administrative and reporting requirements of 40CFR 63 Subpart WWWW for each affected source and associated activities.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

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

**Condition 40: Emission Point Definition By Emission Unit  
Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 40.1:**

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

Emission Unit: B-00001

Emission Point: C0001

Height (ft.): 100

Diameter (in.): 28

NYTMN (km.): 4753.146

NYTME (km.): 188.303

Building: B001

Emission Point: G0001

Height (ft.): 102

Diameter (in.): 24

NYTMN (km.): 4753.146

NYTME (km.): 188.303

Building: B001

Emission Point: G0002

Height (ft.): 102

Diameter (in.): 24

NYTMN (km.): 4753.142

NYTME (km.): 188.304

Building: B001





Emission Point: G0003  
Height (ft.): 102 Diameter (in.): 24  
NYTMN (km.): 4753.146 NYTME (km.): 188.309 Building: B001

Emission Point: G0004  
Height (ft.): 102 Diameter (in.): 24  
NYTMN (km.): 4753.141 NYTME (km.): 188.309 Building: B001

Emission Point: GV007  
Height (ft.): 93 Diameter (in.): 44  
NYTMN (km.): 4753.194 NYTME (km.): 188.311 Building: B001

Emission Point: GV008  
Height (ft.): 100 Diameter (in.): 44  
NYTMN (km.): 4753.159 NYTME (km.): 188.31 Building: B001

Emission Point: GV009  
Height (ft.): 100 Diameter (in.): 44  
NYTMN (km.): 4753.2 NYTME (km.): 188.312 Building: B001

Emission Point: GV010  
Height (ft.): 100 Diameter (in.): 44  
NYTMN (km.): 4753.233 NYTME (km.): 188.314 Building: B001

Emission Point: GV011  
Height (ft.): 100 Diameter (in.): 44  
NYTMN (km.): 4753.306 NYTME (km.): 188.319 Building: B001

Emission Point: GV012  
Height (ft.): 100 Diameter (in.): 60  
NYTMN (km.): 4753.216 NYTME (km.): 188.266 Building: B001

Emission Point: GV013  
Height (ft.): 100 Diameter (in.): 44  
NYTMN (km.): 4753.21 NYTME (km.): 188.267 Building: B001

**Condition 41: Process Definition By Emission Unit  
Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 41.1:**

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

Emission Unit: B-00001  
Process: CTG Source Classification Code: 4-02-022-01  
Process Description:

This process consists of an air-dried coating line for composite parts produced onsite. Currently, 2-part coatings (basecoat (coating) and topcoat (hardener)) are applied. The topcoat is reduced with odorless mineral

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spirits (aliphatic hydrocarbon mix). The basecoat is not reduced. ECI may apply other coatings that meet applicable requirements and emission limits.

Coatings will initially be manually applied by roller, so there will be no particulate emissions. If coatings are spray applied using a High Volume Low Pressure spray gun or other NYSDEC accepted spray equipment, coating operations will be conducted in a booth fitted with a high efficiency filter. If any coatings contain polymeric isocyanates/diisocyanates, then the spray paint booth must be operated with a filter that is rated high efficiency for the capture of particulates/aerosols in the range of 2.5 um to 10 um in diameter.

Emission Source/Control: GVC12 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: CTG01 - Process  
Design Capacity: 8 gallons per hour

Emission Source/Control: CTG02 - Process  
Design Capacity: 8 gallons per hour

**Item 41.2:**

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

Emission Unit: B-00001  
Process: GRD Source Classification Code: 3-08-007-01  
Process Description:

This process is the finish grinding of fiberglass reinforced plastic parts manufactured by LCM and SMC compression molding (ES G0001, ES G0002, & ES G0003) and resin transfer molding (ES G0005 & ES G0006). Particulates generated by grinding operations are controlled by a 98.1% efficient cardboard filter at each emission point.

Emission Source/Control: GC001 - Control  
Control Type: PAPER FILTER

Emission Source/Control: GC002 - Control  
Control Type: PAPER FILTER

Emission Source/Control: GC003 - Control  
Control Type: PAPER FILTER

Emission Source/Control: GVC13 - Control  
Control Type: POLYESTER FILTER

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Emission Source/Control: G0001 - Process  
Design Capacity: 25 parts processed per hour

Emission Source/Control: G0002 - Process  
Design Capacity: 30 parts processed per hour

Emission Source/Control: G0003 - Process  
Design Capacity: 30 parts processed per hour

Emission Source/Control: G0005 - Process  
Design Capacity: 2 parts processed per hour

Emission Source/Control: G0006 - Process  
Design Capacity: 3 parts processed per hour

**Item 41.3:**

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

Emission Unit: B-00001  
Process: MAT Source Classification Code: 3-08-007-99  
Process Description:  
Maturation and storage of Sheet Molding Compound (SMC).

Emission Source/Control: GC004 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: MST01 - Process  
Design Capacity: 120 tons stored per day

**Item 41.4:**

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

Emission Unit: B-00001  
Process: MIX Source Classification Code: 3-08-007-99  
Process Description:

This process consists of all mixing operations for the preparation of Liquid Compression Molding (LCM)

compound, Resin Transfer Molding (RTM) compound and Sheet Molding Compound (SMC) used in the closed compression presses, closed RTM presses and the SMC machine, respectively. Liquid resin, dry filler, pigment and catalyst are placed into batch mixers (Emission Sources (ES) MT001-MT005) to prepare LCM compound. Resin is mixed with hardener in batch mixers (ES MT006, MT007 and MT011) to prepare RTM compound which is then pumped directly from the mixing tank into the RTM press. SMC resin paste is mixed in multiple steps in two ways. In Option A, three mix tanks (MT008, MT009, and MT010) are employed. Polystyrene beads are dissolved in styrene in MT008, the contents are then mixed with filler and resin in MT009, and those contents are then mixed with



pigments and additives in MT010 to make resin paste, which is then fed to the SMC machine. Option A is bottlenecked by the capacity of MT010. Option B eliminates this bottleneck by feeding the contents of MT009 directly to a storage tank, bypassing MT010. Pigment and thickener are added to the MT009 material via a closed in-line (static) mixer at the machine. Option B has the highest potential to emit styrene and particulates.

Particulates from MT001-MT005 are captured initially by vent hoods at each mixer, which are tied to a common 83% efficient cartridge filter system, which vents inside the shop. Those emissions then flow to general ventilation exhaust stacks GV008 and GV009. Particulates generated during the mixing process at MT006, MT007 and MT011 are vented to the atmosphere through general ventilation exhaust stack GV012.

Particulates from MT008, MT009 and MT010 are vented to the atmosphere through emission point G0004. All of the general ventilation exhausts stacks and EP G0004 are equipped with 99.7% efficient polyester filters (Chemco N-Polyester Paint Arrestors) to control particulates.

Emission Source/Control: GVC08 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: GVC09 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: GVC12 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: MT001 - Process  
Design Capacity: 804 pounds per hour

Emission Source/Control: MT002 - Process  
Design Capacity: 804 pounds per hour

Emission Source/Control: MT003 - Process  
Design Capacity: 804 pounds per hour

Emission Source/Control: MT004 - Process  
Design Capacity: 804 pounds per hour

Emission Source/Control: MT005 - Process  
Design Capacity: 804 pounds per hour

Emission Source/Control: MT006 - Process  
Design Capacity: 500 pounds per hour

Emission Source/Control: MT007 - Process  
Design Capacity: 500 pounds per hour



Emission Source/Control: MT008 - Process  
Design Capacity: 531 pounds per hour

Emission Source/Control: MT009 - Process  
Design Capacity: 3,338 pounds per hour

Emission Source/Control: MT010 - Process  
Design Capacity: 3,406 pounds per hour

Emission Source/Control: MT011 - Process  
Design Capacity: 1,310 pounds per hour

**Item 41.5:**

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

Emission Unit: B-00001  
Process: MNL Source Classification Code: 3-08-007-99  
Process Description:

This process involves the manual application of RTM resin to the edges of RTM panels for bonding large parts during assembly. It is regulated as manual application of open molded resin under the Reinforced Plastics Composites MACT rule. Fugitive VOC/HAP emissions from this process are indirectly exhausted to the atmosphere through general ventilation at EP GV012. There are no PM emissions generated during the manual application of RTM resin.

Emission Source/Control: GVC12 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: MNL01 - Process  
Design Capacity: 10 pounds per hour

**Item 41.6:**

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

Emission Unit: B-00001  
Process: P01 Source Classification Code: 3-08-007-36  
Process Description:

This process consists of closed compression molding operations using poured liquid compression molding (LCM) compound and fiberglass to manufacture reinforced plastic parts. LCM compound is manually transferred from the mixing tank to the mold in discrete amounts using open buckets. LCM Presses 4, 5 and 6 (Emission Source (ES) P0004, ES P0005 and ES P0006) can also be used with SMC. This process also includes making LCM parts with the sample press. All of the LCM presses may also be used to produce plastic parts with ready-to-use bulk molding compound (BMC) that is purchased from a vendor.

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Particulate emissions are controlled by a 99.7% efficient polyester filter (Chemco N-Polyester Paint Arrestors) at each press exhaust hood and at EP GV009.

Emission Source/Control: GVC09 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: PC001 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: PC002 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: PC003 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: PC004 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: PC005 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: PC006 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: P0001 - Process  
Design Capacity: 480 pounds per hour

Emission Source/Control: P0002 - Process  
Design Capacity: 480 pounds resin used per hour

Emission Source/Control: P0003 - Process  
Design Capacity: 480 pounds resin used per hour

Emission Source/Control: P0004 - Process  
Design Capacity: 480 pounds resin used per hour

Emission Source/Control: P0005 - Process  
Design Capacity: 480 pounds resin used per hour

Emission Source/Control: P0006 - Process  
Design Capacity: 480 pounds resin used per hour

Emission Source/Control: SAMPL - Process  
Design Capacity: 150 pounds resin used per hour

**Item 41.7:**

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

Emission Unit: B-00001

Process: P02

Source Classification Code: 3-08-007-36

Process Description:



This process consists of closed compression molding operations using sheet molding compound (SMC), bulk molding compound (BMC) or glass mat thermoplastic (GMT) composite to manufacture reinforced plastic parts. The ready-to-use BMC and GMT are purchased from a vendor. SMC is either purchased from a vendor or manufactured onsite. Particulate and VOC/HAP emissions from this process are indirectly vented to the atmosphere through the facility's general ventilation exhaust stacks. Particulate emissions are controlled by a 99.7% efficient polyester filter at each general ventilation stack.

Emission Source/Control: GVC08 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: GVC09 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: GVC10 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: P0007 - Process  
Design Capacity: 750 pounds per hour

Emission Source/Control: P0008 - Process  
Design Capacity: 750 pounds per hour

Emission Source/Control: P0009 - Process  
Design Capacity: 750 pounds per hour

Emission Source/Control: P0010 - Process  
Design Capacity: 750 pounds per hour

Emission Source/Control: P0011 - Process  
Design Capacity: 1,250 pounds per hour

Emission Source/Control: P0012 - Process  
Design Capacity: 1,250 pounds per hour

Emission Source/Control: P0013 - Process  
Design Capacity: 1,250 pounds per hour

Emission Source/Control: SAMPL - Process  
Design Capacity: 150 pounds resin used per hour

**Item 41.8:**

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

Emission Unit: B-00001

Process: PKG

Source Classification Code: 3-08-007-04

Process Description:

This process consists of the finishing and packaging of



manufactured plastic parts. Bulk palletized tiles are moved into the packaging area. A drilling fixture is used to form tile perimeter vent holes and parts are then moved to a table where glue is sprayed onto the perimeter flange. Plastic is applied and adhered to the glue forming a protective cover for shipping. Parts are moved to finished good cartons. Particulate and VOC/HAP emissions from the packaging area are indirectly vented to the atmosphere through general ventilation exhaust stack EP GV009. Process PKG also includes the use of small quantities of miscellaneous adhesives plantwide with particulate and VOC/HAP emissions indirectly vented to the atmosphere through various general ventilation exhaust stacks. Particulate emissions are controlled by a 99.7% efficient polyester filter at each general ventilation stack.

Emission Source/Control: GVC09 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: PKG01 - Process  
Design Capacity: 2.1 pounds adhesive used per hour

**Item 41.9:**

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

Emission Unit: B-00001  
Process: RTM Source Classification Code: 3-08-007-36  
Process Description:

This is a closed resin transfer molding process using vacuum infusion. The molds are opened and closed hydraulically. The mold is filled with fiberglass and clamped shut. A vacuum is pulled on the mold cavity and then a resin + hardener mixture is pumped and pulled directly into the mold through tubing. The part cures in the closed mold. The part is removed and the cycle is repeated. VOC/HAP emissions from this process are indirectly vented to the atmosphere through the facility's general ventilation exhaust stack at EP GV012. There are no particulate emissions generated during this process.

Emission Source/Control: GVC12 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: RTM01 - Process  
Design Capacity: 500 pounds per hour

Emission Source/Control: RTM02 - Process  
Design Capacity: 500 pounds per hour



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Emission Source/Control: RTM03 - Process  
Design Capacity: 500 pounds per hour

**Item 41.10:**

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

Emission Unit: B-00001

Process: SMC

Source Classification Code: 3-08-007-99

Process Description:

This process consists of the production of sheet molding compound (SMC) using an SMC machine. Prepared SMC paste mixture is fed into the machine doctor box (reservoir) and is spread onto a nylon film. Chopped glass fiber is deposited on the paste on the lower film. The top film with paste is inverted and rolled on top of the lower film to sandwich the glass fibers and paste. This sandwiched package is pulled through a compacting section of the machine. The compacted sheet is accumulated and placed into a container lined with a polyethylene bag. The bag is closed to prevent styrene evaporation during storage (maturation) before use in Process P02. Particulate emissions are controlled by a 99.7% efficient polyester filter at the general ventilation exhaust stack.

Emission Source/Control: GVC08 - Control  
Control Type: POLYESTER FILTER

Emission Source/Control: SMC01 - Process  
Design Capacity: 11.8 meters per minute

**Condition 42: NESHAP General Provisions**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63, Subpart A**

**Item 42.1:**

This Condition applies to Emission Unit: B-00001

**Item 42.2:**

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

**Condition 43: Operations included in an affected source**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5790, Subpart WWW**

**Item 43.1:**

This Condition applies to Emission Unit: B-00001



**Item 43.2:**

The affected source consists of all parts of the facility which are engaged in the following operations:

- open molding
- closed molding
- centrifugal casting
- continuous lamination
- continuous casting
- polymer casting
- pultrusion
- sheet molding compound (SMC) manufacturing
- bulk molding compound (BMC) manufacturing
- mixing
- cleaning of equipment used in reinforced plastic composites manufacture
- HAP-containing materials storage
- repair operations on parts also manufactured

**Condition 44: Compliance date for new area sources**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5800, Subpart WWWW**

**Item 44.1:**

This Condition applies to Emission Unit: B-00001

**Item 44.2:**

If the facility is a new area source at startup and later becomes a major source of HAPs, then the facility must comply with the requirements of subpart WWWW immediately upon becoming a major source.

**Condition 45: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5805, Subpart WWWW**

**Item 45.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

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

**Item 45.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

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**Monitoring Description:**

If the facility is an open molding - corrosion-resistant and/or high strength (CR/HS) operation, and the facility uses a manual resin application, then the organic HAP emission limit is 123 lb/ton.

The facility may elect to comply with this limit using any of the options listed in §63.5810-5830.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 123 pounds per ton

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 46: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5805, Subpart WWWW**

**Item 46.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 46.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

If the facility is an open molding, non-corrosion-resistant and/or high strength (non-CR/HS) operation, and the facility uses a manual resin application, then the organic HAP emission limit is 87 lb/ton.

The facility may elect to comply with this limit using any of the options listed in §63.5810-5830.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 87 pounds per ton

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 47: General condition for open molding and centrifugal casting operations**



Effective between the dates of 01/28/2015 and 01/27/2020

Applicable Federal Requirement:40CFR 63.5810, Subpart WWWW

**Item 47.1:**

This Condition applies to Emission Unit: B-00001

**Item 47.2:**

The facility must use one of the methods listed in §63.5810(a)-(d) to meet the standards for open molding or centrifugal casting operations in table 3 or 5 of subpart WWWW.

The facility may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of the emissions to an add-on control device.

The facility may use different compliance options for the different operations listed in tables 3 or 5.

The necessary calculations must be completed within 30 days after the end of each month.

The facility may switch between the compliance options. When the facility changes to an option based on a 12-month rolling average, the facility must base the average on the previous 12 months of data calculated using the compliance option the facility is changing to, unless the facility was previously using an option that did not require the facility to maintain records of resin and gel coat use. In this case, the facility must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

**Condition 48: Compliance Certification**

Effective between the dates of 01/28/2015 and 01/27/2020

Applicable Federal Requirement:40CFR 63.5835, Subpart WWWW

**Item 48.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 48.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- (a) The facility must be in compliance at all times with the work practice standards in table 4 of subpart WWWW, as well as the organic HAP emission limits in tables 3 or 5, or the organic HAP content limits in table 7, as



applicable, that the facility is meeting without the use of add-on controls.

(b) The facility must be in compliance with all organic HAP emission limits in subpart WWWW that the facility meets using add-on controls, except during periods of startup, shutdown, and malfunction.

(c) The facility must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

(d) The facility must develop a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3) for any organic HAP emission limits the facility meets using an add-on control.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 49: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5895(c), Subpart WWWW**

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 49.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the facility is meeting any organic HAP emission limit based on an organic HAP emission limit in tables 3 or 5 of subpart WWWW.

The facility must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the facility is meeting any organic HAP content limits in table 7 of subpart WWWW if the facility is averaging organic HAP contents.



Resin use records may be based on purchase records if the facility can reasonably estimate how the resin is applied.

The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 50: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5895(d), Subpart WWWW**

**Item 50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 50.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a).

However, the facility must retain the records of resin and gel coat organic HAP content, and the facility must include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports.

If after the facility has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the facility changes the application method or controls, then the facility again must demonstrate that the individual resin or gel coat meets its emission limit as specified in §63.5810(a).



If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in table 3 or 5 of subpart WWWW, the facility must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 51: 5900(a)(4) - Continuous compliance with work practice standards**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5900, Subpart WWWW**

**Item 51.1:**

This Condition applies to Emission Unit: B-00001

**Item 51.2:**

Compliance with the work practice standards in table 4 of subpart WWWW is demonstrated by performing the work practice required for the operation.

**Condition 52: 5900(b) - Deviation reports**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5900, Subpart WWWW**

**Item 52.1:**

This Condition applies to Emission Unit: B-00001

**Item 52.2:**

The facility must report each deviation from each standard in §63.5805 that applies. The deviations must be reported according to the requirements in §63.5910.

**Condition 53: 5900(c) - Limits and standards apply at all times except during S/S/M**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5900, Subpart WWWW**

**Item 53.1:**

This Condition applies to Emission Unit: B-00001

**Item 53.2:**

Except as provided in §63.5900(d), during periods of startup, shutdown, or malfunction, the facility must meet the organic HAP emission limits and work practice standards that apply to the facility.

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**Condition 54: 5900(e) - Records to show that deviations are not violations**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5900, Subpart WWWW**

**Item 54.1:**

This Condition applies to Emission Unit: B-00001

**Item 54.2:**

Consistent with §63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources and standards specified in §63.5900(d) are not violations if the facility demonstrates to NYSDEC's satisfaction that the facility was operating in accordance with §63.6(e)(1). NYSDEC will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in §63.6(e).

**Condition 55: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5900, Subpart WWWW**

**Item 55.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 55.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Compliance with organic HAP emission limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emission limit listed in table 3 or 5 of subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 56: Compliance Certification**



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**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5905, Subpart WWWW**

**Item 56.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 56.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit all of the notifications in table 13 of subpart WWWW that apply by the dates specified in table 13. The notifications are described in more detail in 40CFR63, subpart A, referenced in table 13.

If the facility changes any information submitted in any notification, the facility must submit the changes in writing to NYSDEC within 15 calendar days after the change.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 57: Reports listed in table 14**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5910(a), Subpart WWWW**

**Item 57.1:**

This Condition applies to Emission Unit: B-00001

**Item 57.2:**

The facility shall submit all of the reports listed in table 14 of subpart WWWW which apply to the facility.

**Condition 58: Schedule for semiannual reports**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5910(b), Subpart WWWW**

**Item 58.1:**

This Condition applies to Emission Unit: B-00001

**Item 58.2:**

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Unless NYSDEC has approved a different schedule for submission of reports under §63.10(a), the facility must submit each report by the date specified in table 14 and according to the following schedule:

- 1) The first compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.5800 and ending on June 30 or December 31, whichever is the first date following the end of the first calendar half after the compliance date that is specified in §63.5800.
- 2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source in §63.5800.
- 3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- 4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- 5) For each affected source that is subject to permitting requirements pursuant to 40CFR70 or 71, the facility may submit the first and subsequent compliance reports according to the dates that NYSDEC has established instead of according to the dates above.

**Condition 59: Contents of semiannual reports**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5910(c), Subpart WWWW**

**Item 59.1:**

This Condition applies to Emission Unit: B-00001

**Item 59.2:**

The compliance report must contain the information below:

- 1) Company name and address
- 2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the contents of the report.
- 3) Date of the report and beginning and ending dates of the reporting period.
- 4) If the facility had a startup, shutdown, or malfunction during the reporting period and the facility took actions consistent with the startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
- 5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in table 4 of subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

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6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

**Condition 60: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5910(d), Subpart WWWW**

**Item 60.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 60.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each deviation from an organic HAP emission limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where the facility is not using a CMS to comply with the organic HAP emissions limitations or work practice standards in subpart WWWW, the compliance report must contain the information in §63.5910(c)(1)-(4) and below. this includes periods of startup, shutdown, and malfunction.

1) The total operating time of each affected source during the reporting period.

2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 61: Exceedance of 100 tons/year threshold**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5910(f), Subpart WWWW**

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**Item 61.1:**

This Condition applies to Emission Unit: B-00001

**Item 61.2:**

The facility must report if the facility exceeds the 100 tons/year organic HAP emissions threshold if that exceedance would make the facility subject to §63.5805(a)(1) or (d). Include with this report any request for an exemption under §63.5805(e). If the facility receives an exemption under §63.5805(e) and subsequently exceeds the 100 tons/year organic HAP threshold, the facility must report this exceedance as required in §63.5805(f).

**Condition 62: Reporting of deviations with semiannual title V reports**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5910(g), Subpart WWWW**

**Item 62.1:**

This Condition applies to Emission Unit: B-00001

**Item 62.2:**

Each affected source that has obtained a title V operating permit pursuant to 40CFR70 or 71 must report all deviations as defined in subpart WWWW in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to table 14 of subpart WWWW along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitations (including any operating limit) or work practice requirement in subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the NYSDEC.

**Condition 63: Notification of change in compliance option**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5910(i), Subpart WWWW**

**Item 63.1:**

This Condition applies to Emission Unit: B-00001

**Item 63.2:**

Where multiple compliance options are available, the facility must state in the next compliance report if the facility has changed compliance options since the last compliance report.

**Condition 64: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5915, Subpart WWWW**

**Item 64.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 64.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must keep records listed below:

- 1) A copy of each notification and report that the facility submitted to comply with subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the facility submitted, according to the requirements in §63.10(b)(2)(xiv).
- 2) The records in §63.6(e)(3)(iii)-(v) related to startup, shutdown, and malfunction.
- 3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 65: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5915, Subpart WWWW**

**Item 65.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 65.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations

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listed in tables 3, 5, and 7 of subpart WWWW.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 66: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5915, Subpart WWWW**

**Item 66.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 66.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must keep a certified statement that the facility is in compliance with the work practice standards in table 4 of subpart WWWW that apply.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 67: Record retention : 5920(a)-(d)**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5920, Subpart WWWW**

**Item 67.1:**

This Condition applies to Emission Unit: B-00001

**Item 67.2:**

The facility must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).

As specified in §63.10(b)(1), the facility must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

The facility must keep each record onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to

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§63.10(b)(1). The facility can keep the records offsite for the remaining three years.

The facility may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

**Condition 68: General provisions**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.5925, Subpart WWWW**

**Item 68.1:**  
This Condition applies to Emission Unit: B-00001

**Item 68.2:**  
Table 15 of subpart WWWW shows which parts of the general provisions listed in subpart A of 40CFR63 apply to the facility.

**Condition 69: Once in always in**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 69.1:**  
This Condition applies to Emission Unit: B-00001  
Process: CTG

Item 69.2:  
Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

**Condition 70: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 70.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: B-00001  
Process: CTG

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

**Item 70.2:**

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 71: Surface Coating- Prohibitions**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 71.1:**

This Condition applies to Emission Unit: B-00001

Process: CTG

**Item 71.2:**





(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

**Condition 72: Surface Coating - Handling, storage and disposal**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 72.1:**

This Condition applies to Emission Unit: B-00001  
Process: CTG

**Item 72.2:**

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

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

(2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating



material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
  - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
  - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
  - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
  - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

**Condition 73: Surface Coating- application requirements  
Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 73.1:**

This Condition applies to Emission Unit: B-00001  
Process: CTG

**Item 73.2:**

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;
- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;
- (vii) airless spray, (including air assisted);
- (viii) airbrush application methods for stenciling, lettering, and other identification markings; or



(ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

**Condition 74: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 6 NYCRR 228-1.4 (b) (5)**

**Item 74.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001  
Process: CTG

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

**Item 74.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

(5) Miscellaneous plastic parts coatings

(i) A facility applying Miscellaneous Plastic Parts Coatings must use application techniques as specified in section 228-1.3(e)(3) of this Subpart.

(ii) A facility applying miscellaneous plastic parts coatings may not use coatings with VOC contents, as applied, which exceed the limits specified in table B5. The units in table B5 are in terms of weight (kilograms or pounds) of VOC per volume (liters or gallons) of coating (minus water and excluded compounds) at application.

For miscellaneous plastic parts coating, the following types of coatings and coating operations are exempt from the VOC content limits of table B5:

(a) touch-up and repair coatings;

(b) stencil coatings applied on clear or transparent substrates;

(c) clear or translucent coatings;



(d) coatings applied at a paint manufacturing facility while conducting performance tests on the coatings;

(e) Any individual coating category used in volumes less than 50 gallons in any 12 month period, if substitute compliant coatings are not available, provided that the total usage of all such coatings does not exceed 200 gallons in a 12 month period. Records of such coating must be maintained in accordance with section 228-1.3(b)(2) of this Subpart of the general requirements;

(f) reflective coating applied to highway cones;

(g) mask coatings that are less than 0.5 millimeters thick (dried) and the area coated is less than 25 square inches;

(h) EMI/RFI shielding coatings; and

(i) heparin-benzalkonium chloride (HBAC)-containing coatings applied to medical devices, provided that the total usage of all such coatings does not exceed 100 gallons in a 12 month period Records of such low use coating must be maintained in accordance with section 228-1.3(b)(2) of this Subpart of the general requirements.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING MIXED

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 75: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 75.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

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**Item 75.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 76: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4490(a)(1), Subpart PPPP**

**Item 76.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 76.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a new or reconstructed affected source that belongs to the general use coating subcategory as defined in §63.4581, the facility shall limit organic HAP emissions to no more than 0.16 kg organic HAP/kg coating solids used during each 12-month compliance period.

Compliance will be determined according to the requirements in §63.4541 if the facility chooses to use compliant coatings to meet the emission limit above,

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§63.4551 if the facility chooses to use the emission rate without add-on control option, or §63.4561 if the facility chooses to use an add-on control device to meet the emission limit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 77: General requirements for compliant coatings and emission rate without add-on control devices**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4500(a)(1), Subpart PPPP**

**Item 77.1:**

This Condition applies to Emission Unit: B-00001  
Process: CTG

**Item 77.2:**

The coating operation(s) for which the facility uses the compliant materials option or the emission rate without add-on controls option must be in compliance with the applicable emission limit in §63.4490 at all times without regard to startup, shutdown, or malfunction situations.

**Condition 78: Operation of affected source**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4500(b), Subpart PPPP**

**Item 78.1:**

This Condition applies to Emission Unit: B-00001  
Process: CTG

**Item 78.2:**

The facility must always operate and maintain the affected source, including all air pollution control and monitoring equipment used for purposes of complying with subpart PPPP, according to the provisions in §63.6(e)(1)(i).

**Condition 79: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4510(b), Subpart PPPP**

**Item 79.1:**

The Compliance Certification activity will be performed for:

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Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 79.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit the initial notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup. If the facility is complying with another NESHAP that constitutes the predominant activity at the facility under §63.4481(e)(2) to constitute compliance with Subpart PPPP for the plastic parts coating operations, then the facility must include a statement to this effect in the initial notification, and no other notifications are required under Subpart PPPP in regard to those plastic parts coating operations.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 80: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4510(c), Subpart PPPP**

**Item 80.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 80.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §63.4540, §63.4550, or §63.4560 that applies to the affected source. The notification of compliance status must contain the following information:

1- Company name and address



- 2- Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- 3- Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §63.4540, 4550, or 4560 that applies to the affected source.
- 4- Identification of the compliance option or options specified in §63.4491 that were used on each coating operation in the affected source during the initial compliance period.
- 5- Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
- 6- If there was a deviation, include a description and statement of the cause of the deviation and if the emission limit in §63.4490 was not met, include all calculations used to determine the kg organic HAP emitted per kg coating solids used. The facility does not need to submit information provided by the materials' suppliers or manufacturers, or test reports.
- 7- For each of the data items listed in §63.4510(c)(7)(i)-(iv) that is required by the compliance option used to demonstrate compliance with the emission limit, include an example of how the value was determined including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.4541(a), (b), or (c). Test reports do not need to be submitted.
- 8- The calculation of kg organic HAP emitted per kg coating solids used for the compliance option(s) used, as specified in §63.4510(c)(8)(i)-(iii).
- 9- For the emission rate with add-on controls option, the facility must include the information specified in §63.4510(c)(9)(i)-(iv).

Monitoring Frequency: ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 81: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 40CFR 63.4520(a), Subpart PPPP**

**Item 81.1:**  
The Compliance Certification activity will be performed for:



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Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 81.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.4490, the semiannual compliance report must contain the following information:

- the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.4490
- the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The facility must submit the calculations for Equations 1, 1A-C, 2, and 3 of §63.4551; and if applicable, the calculation used to determine the mass of organic HAP in waste materials according to §63.4551(e)(4). Background data supporting these calculations does not need to be provided.
- a statement of the cause of each deviation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 82: Compliance Certification**

Effective between the dates of 01/28/2015 and 01/27/2020

Applicable Federal Requirement: 40CFR 63.4520(a), Subpart PPPP

**Item 82.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

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**Item 82.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility used the compliant coatings option to demonstrate compliance with the emission limits and there was a deviation from the applicable organic HAP content requirements in §63.4490, the semiannual compliance report must contain the following information:

- identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used
- the calculation of the organic HAP content using equation 1 of §63.4541 for each coating identified above. Background data supporting this calculation does not need to be provided
- the determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified above. Background data supporting this calculation does not need to be provided
- a statement of the cause of each deviation

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 83: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4520(a), Subpart PPPP**

**Item 83.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 83.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



The facility must submit semiannual compliance reports for each affected source according to the following requirements:

Dates: The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period (as described in §63.4540, 4550, or 4560) and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.

Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1-June 30 or July 1-December 31. Each report must be postmarked no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

If the affected source is subject to title V permitting regulations, and if the NYSDEC has established dates for submitting semiannual reports pursuant to §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), the facility may submit the first and subsequent compliance reports according to the dates that the semiannual reports for the permit are due.

The semiannual compliance report must include the following:

- company name and address
- statement by a responsible official with the official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- identification of the compliance option or options specified in §63.4491 that was used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, the beginning and ending dates of each option must be listed in the report.
- if the emission rate with or without add-on controls was used, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month compliance period.
- if there were no deviations from the emission limits in §63.4490, 4492, and 4493 that apply to the facility, the semiannual compliance report must include a statement that



there were no deviations from the emission limitations during the reporting period. If the facility used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 84: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4530(a), Subpart PPPP**

**Item 84.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 84.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must collect and keep a copy of each notification and report that was submitted to comply with subpart PPPP, and the documentation supporting each notification and report. If the facility is using the predominant activity alternative under §63.4490(c), records of the data and calculations used to determine the predominant activity must be kept. If the facility is using the facility-specific emission limit alternative under §63.4490(c), records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration must be kept. The facility must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semiannual compliance reports.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 85: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4530(b), Subpart PPPP**

**Item 85.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 85.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must collect and keep a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If the facility conducted testing to determine mass fraction of organic HAP, density, or mass fraction of coating solids, the facility must keep a copy of the complete test report. If the facility uses information provided by the manufacturer or supplier of the material that was based on testing, the facility must keep the summary sheet of results provided by the manufacturer or supplier. The facility is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 86: Compliance Certification**

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**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4530(c), Subpart PPPP**

**Item 86.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001  
Process: CTG

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

**Item 86.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must maintain and keep records for each compliance period detailing which compliance option was used for each coating operation and the time periods (beginning and ending dates and times) for each option that was used.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 87: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4530(c), Subpart PPPP**

**Item 87.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001  
Process: CTG

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

**Item 87.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For the compliant materials option, the facility must maintain and keep records of the calculation of the

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organic HAP content for each coating, using Equation 1 of §63.4541.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 88: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4530(c), Subpart PPPP**

**Item 88.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 88.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is using the emission rate without add-on controls option, the facility must maintain and keep records of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using equations 1, 1A-1C, and 2 of §63.4551 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4551(e)(4); the calculation of the total mass of coating solids used each month using equations 2 of §63.4551; and the calculation of each 12-month organic HAP emission rate using equations 3 of §63.4551.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 89: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**



**Applicable Federal Requirement:40CFR 63.4530(d), Subpart PPPP**

**Item 89.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 89.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must maintain and keep records of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the facility is using the compliant material option for all coatings at the source, the facility may maintain purchase records for each material used rather than a record of the mass used.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 90: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4530(e), Subpart PPPP**

**Item 90.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 90.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must maintain and keep records of the mass fraction of organic HAP for each coating, thinner and/or



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other additive, and cleaning material used during each compliance period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 91: Compliance Certification**  
Effective between the dates of 01/28/2015 and 01/27/2020

**Applicable Federal Requirement:40CFR 63.4530(f), Subpart PPPP**

**Item 91.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 91.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must maintain and keep records of the mass fraction of coating solids for each coating used during each compliance period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 92: Compliance Certification**  
Effective between the dates of 01/28/2015 and 01/27/2020

**Applicable Federal Requirement:40CFR 63.4530(g), Subpart PPPP**

**Item 92.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

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CAS No: 0NY100-00-0 TOTAL HAP

**Item 92.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility uses an allowance in equation 1 of §63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.4551(e)(4), the facility must maintain and keep records of the following information:

- the name and address of each TSDF to which waste materials were sent for which an allowance was claimed, a statement of which subparts under 40CFR262, 264, 265, and 266 apply to the facility, and the date of each shipment.
- identification of the coating operations producing waste materials included in each shipment and the month or months in which the allowance for these materials was claimed.
- the methodology used in accordance with §63.4551(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 93: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4530(h), Subpart PPPP**

**Item 93.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

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

**Item 93.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must maintain and keep records of the date, time, and duration of each deviation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 94: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4551, Subpart PPPP**

**Item 94.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001  
Process: CTG

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

**Item 94.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source.

To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.4490, but is not required to meet the operating limits or work practice standards in §63.4492 or 63.4493, respectively.

The facility must conduct a separate initial compliance demonstration for each general use, TPO, automotive lamp,



and assembled on-road vehicle coating operation unless the facility is demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.4490(c).

When calculating the organic HAP emission rate, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which the compliant materials or emission rate without add-on controls option are used. Coatings that are reclaimed or reused within the operation do not need to be included in the calculations.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 95: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4551(h), Subpart PPPP**

**Item 95.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 95.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The organic HAP emission rate for the initial compliance period calculated using Equation 3 of §63.4551 must be less than or equal to the applicable emission limit for each subcategory in §63.4490.

The facility must keep all records as required by §63.4530 and §63.4531.

As part of the notification of compliance status required by §63.4510, the facility must identify the coating operation(s) for which the emission rate without add-on controls option was used and submit a statement that the coating operation(s) was (were) in compliance with the

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emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.4490, determined according to the procedures in §63.4551.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 96: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4552, Subpart PPPP**

**Item 96.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 96.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.4551(a)-(g), must be less than or equal to the applicable emission limit in §63.4490. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4550 is the end of a compliance period consisting of that month and the preceding 11 months. The facility must perform the calculations in §63.4551(a)-(g) on a monthly basis using data from the previous 12 months of operation.

If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.4490, this is a deviation from the emission limit for that compliance period and must be reported as specified in §63.4510(c)(6) and §63.4520(a)(6).

As part of each semiannual compliance report required by §63.4520, the facility must identify the coating operation for which the emission rate without add-on controls option

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was used. If there were no deviations from the emission limitations, the facility must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.4490, determined according to §63.4551(a)-(g).

The facility must keep records as specified in §63.4530 and §63.4531.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 97: Maintenance of records**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4531, Subpart PPPP**

**Item 97.1:**

This Condition applies to Emission Unit: B-00001

Process: CTG

Emission Source: CTG01

**Item 97.2:**

The facility's records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

As specified in §63.10(b)(1), the facility must keep each records for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

The facility must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The facility may keep records off-site for the remaining 3 years.

**Condition 98: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4540, Subpart PPPP**

**Item 98.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Emission Source: CTG01

Regulated Contaminant(s):

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CAS No: 0NY100-00-0 TOTAL HAP

**Item 98.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must complete the initial compliance demonstration for the initial compliance period according to the requirements in §63.4541. The initial compliance period begins on the applicable compliance date specified in §63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to §63.4541 and supporting documentation showing that during the initial compliance period, the facility used no coating with an organic HAP content that exceeded the applicable emission limit in §63.4490, and that the facility used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to §63.4541(a).

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 99: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:40CFR 63.4541, Subpart PPPP**

**Item 99.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Emission Source: CTG01

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 99.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility may use the compliant coating option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. To demonstrate initial compliance using the compliant coating option, the coating



operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in §63.4490 and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to §63.4541.

The facility must conduct a separate initial compliance demonstration for each general use coating, TPO coating, automotive lamp coating, and assembled on-road vehicle coating affected source unless the facility is demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.4490(c).

The facility does not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if there is documentation showing that the facility received back the exact same materials that were sent off-site) and reused in the coating operation for which the facility uses the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 100: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 40CFR 63.4542, Subpart PPPP**

**Item 100.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: CTG

Emission Source: CTG01

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 100.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each compliance period, the facility must use no coating for which the organic HAP content (determined





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CAS No: 0NY100-00-0 TOTAL HAP

**Item 101.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.4551. The initial compliance period begins on the applicable compliance date specified in §63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months.

The facility must determine the mass of organic HAP emissions and mass of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.4551 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.4490.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 102: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 228-2.4 (a)**

**Item 102.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Process: PKG

Emission Unit: B-00001

Process: RTM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 102.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

When a facility uses a commercial or industrial adhesive, sealant, adhesive primer or sealant primer, the concentration of the volatile organic compounds (VOC) shall not exceed the VOC content limits specified in Table 1 of 6 NYCRR Part 228-2.4. For adhesives applied to the listed substrates in Table 1, the respective VOC content limits apply as follows:

(1) when an adhesive or sealant is subject to a specific VOC content limit in Table 1, the specific limit is 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: 200 grams per liter

Reference Test Method: 24 or SCAQMD Method

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 103: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement:6 NYCRR 228-2.4 (b) (1)**

**Item 103.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Process: PKG

Emission Unit: B-00001

Process: RTM

Regulated Contaminant(s):

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CAS No: 0NY998-00-0 VOC

**Item 103.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The concentration of volatile organic compounds (VOC) in all surface preparation solvents used at the facility shall be less than 70 grams per liter.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 104: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (3)**

**Item 104.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Process: PKG

Emission Unit: B-00001

Process: RTM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 104.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The composite vapor pressure of all cleanup solvents used at the facility shall be less than 45 mm Hg at 20 degrees Celsius.

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Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: SOLVENT  
Parameter Monitored: COMPOSITE VAPOR PRESSURE  
Upper Permit Limit: 45 millimeters of mercury  
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 105: Cleanup of spray application equipment in an enclosed cleaning system**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 105.1:**

This Condition applies to:

Emission Unit: B00001  
Process: PKG

Emission Unit: B00001  
Process: RTM

**Item 105.1:**

This Condition applies to Emission Unit: B-00001  
Process: PKG

**Item 105.2.3:**

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: 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).

**Condition 106: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 106.1:**

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

Emission Unit: B-00001  
Process: PKG

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Emission Unit: B-00001  
Process: RTM

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

**Item 106.2:**

Compliance Certification 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 use a solvent with a VOC content less than or equal to 70 grams per liter.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 107: Compliance Certification**

**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 107.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001  
Process: PKG

Emission Unit: B-00001  
Process: RTM

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

**Item 107.2:**

Compliance Certification shall include the following monitoring:

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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 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: 9.5 millimeters of mercury

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 108: Compliance Certification**

Effective between the dates of 01/28/2015 and 01/27/2020

Applicable Federal Requirement: 6 NYCRR 228-2.4 (d)

**Item 108.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Process: PKG

Emission Unit: B-00001

Process: RTM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 108.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Work practices shall be employed at facilities where the



total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed three tons in a 12-month rolling period, before consideration of emission control equipment. Work practices shall include:

(1) the following types of application equipment, with the use of low-VOC adhesives or adhesive primers: electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to Department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;

(2) the following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive-related waste materials that:

(i) store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers;

(ii) ensure that mixing and storage containers used for VOC-containing adhesives, adhesive primers, and process related waste materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing adhesives, adhesive primers, and process related waste materials; and

(iv) convey VOC-containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes.

(3) the following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:

(i) store all VOC-containing cleaning materials and used shop towels in closed containers;

(ii) ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing these materials;





(iii) minimize spills of VOC-containing cleaning materials;

(iv) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

(v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 109: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable Federal Requirement: 6 NYCRR 228-2.5 (a)**

**Item 109.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Process: PKG

Emission Unit: B-00001

Process: RTM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 109.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities using products subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall maintain records demonstrating compliance with the VOC content limits, including, but not limited to, the following information:

(1) a list of each commercial and industrial adhesive,

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sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the facility;

(2) identification of each product by product name and description;

(3) the VOC content of each product as supplied;

(4) the mix ratio of any catalysts, reducers or other components used;

(5) the final VOC content or vapor pressure, as applied; and

(6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 110: Compliance Certification**  
Effective between the dates of 01/28/2015 and 01/27/2020

**Applicable Federal Requirement: 6 NYCRR 228-2.5 (c)**

**Item 110.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001

Process: PKG

Emission Unit: B-00001

Process: RTM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 110.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records made to determine compliance with Subpart

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228-2 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 111: Surface coating access for sampling**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 111.1:**

This Condition applies to Emission Unit: B-00001 Emission Point: C0001  
Process: CTG

**Item 111.2:**

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

**Condition 112: Compliance Certification**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 112.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-00001 Emission Point: GV012  
Process: CTG

**Item 112.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting a Method 9 opacity evaluation at a minimum frequency of once per year, while the source is in normal operating mode.



In addition to the above opacity evaluation, the permittee will conduct daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

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

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 113: Contaminant List**

**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 113.1:**

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

CAS No: 000100-42-5

Name: STYRENE

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CAS No: 000541-02-6  
Name: DECAMETHYLCYCLOPENTASILOXANE

CAS No: 002855-13-2  
Name: CYCLOHEXANEMETHANAMINE, 5-AMINO-1,3,3 TRIMEHYL

CAS No: 004098-71-9  
Name: ISOPHORONE DIISOCYANATE

CAS No: 013463-67-7  
Name: TITANIUM DIOXIDE

CAS No: 025068-38-6  
Name: PHENOXY RESIN

CAS No: 028182-81-2  
Name: DIISOCYANATE,1-6-HEXAMETHYLENE

CAS No: 054914-37-3  
Name: CYCLOHEXANEMETHANAMINE....

CAS No: 068609-97-2  
Name: OXIRANE, MONO[C12-14 ALKYOXY METHYL]

CAS No: 072259-73-5  
Name: HEXANEDIOIC ACID, POLYMER AND  
5-ISOCYANATO-1-(ISOCYANATOME)...

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

CAS No: 0NY100-00-0  
Name: TOTAL HAP

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

**Condition 114: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

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

**Item 114.1:**

(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 malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued



for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

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

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

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

**Condition 115: Compliance Demonstration**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable State Requirement:6 NYCRR 201-3.1 (b)**

**Item 115.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 115.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(b) Unless otherwise provided for in this Chapter, emissions from exempt and trivial activities must be included in potential to emit calculations when determining whether an emission source is subject to:

(1) title V facility permitting pursuant to Subpart 201-6 of this Part; and/or



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(2) new source review pursuant to Part 231 of this Title.

ECI is allowed to calculate VOC emissions from exempt and trivial activities on an annual basis up to 4.0 tpy, including fugitive emissions, while 12-month rolling VOC totals from permitted emission sources and Op-Flex sources remain less than 45.0 tpy. Otherwise, monthly emissions from exempt and trivial activities must be included in facility-wide emission calculations to determine compliance with the 49.0 limit on ECI's potential to emit VOCs.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 116: Compliance Demonstration**  
**Effective between the dates of 01/28/2015 and 01/27/2020**

**Applicable State Requirement:6 NYCRR 201-3.1 (c)**

**Item 116.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 116.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(c) If the total potential to emit for all exempt and trivial activities at a facility exceeds, or causes the facility to exceed, the major facility threshold, as defined in Subpart 201-2 of this Part, the facility is both subject to the provisions of Subpart 201-6 of this Part and no longer considered exempt or trivial for permitting purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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



**Condition 117: Compliance Demonstration**  
Effective between the dates of 01/28/2015 and 01/27/2020

**Applicable State Requirement:6 NYCRR 201-3.1 (d)**

**Item 117.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 117.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(d) If physical and/or operational restrictions are required to maintain the total potential to emit for one or more of the listed exempt and trivial activities below the title V applicability thresholds described in Subpart 201-6 of this Part, or new source review requirements described in Part 231 of this Title, the activity is no longer considered exempt or trivial for permitting purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

