

Facility DEC ID: 9140900096

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1409-00096/00001
Effective Date: 11/14/2019 Expiration Date: 11/13/2029

Permit Issued To: TMP TECHNOLOGIES INC
1200 NORTHLAND AVE
BUFFALO, NY 14215-3835

Contact: LUKE STEWART
TRS PACKAGING INC
205 DINGENS ST
BUFFALO, NY 14206
(716) 823-4580

Facility: TRS Packaging Inc
Dona St
Lackawanna, NY 14218

Description:

TRS Packaging, Inc. is a foam stamping and packaging facility. The facility includes foam compressing processes, a lamination process and a corona treatment process.

3 foam presses perform the foam compressing process where BASOTECT melamine-formaldehyde-polycondensate foam sheets are placed in a heated (550F) press and clamped for two to three minutes. This process generates formaldehyde at the rate of 1.78 lbs per hour. The 3 presses will be in a permanent total enclosure, as defined by EPA Method 204, to ensure 100% of the Formaldehyde emissions are captured and sent to the wet scrubber. The pressure differential in each of the 3 presses will be monitored to ensure 100% capture. The wet scrubber shall be properly maintained to reduce Formaldehyde emissions by approximately 99%. The wet scrubber pH, Oxidation-Reduction Potential (ORP) and water flow rate will be monitored to ensure 99% removal efficiency. The wet scrubber exhausts through emission point EP001.

Formaldehyde emissions from emission point EP001 were modeled using AERMOD and determined to be 0.285 micrograms per meter cubed at the off-site fence line. The annual guideline concentration value for Formaldehyde is 0.06 micrograms per meter cubed. The annual guideline concentration value is based on 1-in-a-million excess cancer risks. 10-in-a-million excess cancer risks is approximately equivalent to 0.6 micrograms per meter cubed for Formaldehyde. According to DAR-1 - Guidelines for the Evaluation and Control of Ambient Air Contaminants Under Part 212, an off-site concentration of 0.285 micrograms per meter cubed is within the Department's acceptable residual risk management range. The acceptable residual risk management range for any contaminant is an offsite concentration that is less than 10-in-a-million excess cancer risks from the annual guideline concentration value.

The foam stamping operation uses a lamination process to bond melamine foam to polyurethane rolled foam using a PUR adhesive heated to 260 F and applied by mechanical roller. The adhesive is subject to 6 NYCRR Part 228-2 and will need to maintain records to prove the VOC

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content limit is met. This process generates Methylene Diphenyl Diisocyanate (MDI) emissions at a rate of 0.18 lbs per year, less than 100 lbs per year, which is in compliance with 6 NYCRR 212-2.2 Table 2 - High Toxicity Air Contaminant List. MDI emissions will be limited to less than 100 pounds per year. The lamination process exhausts through emission point EP002.

The corona treater is used to increase the surface tension of the plastic film. The treater converts standard 60Hz power to a high frequency power which is applied to the surface of the material by way of electrodes. The treated side of the material provides increased surface tension for improved adhesion of our adhesive and a stronger lamination strength. After the Corona treating the film is applied to a piece of melamine foam that has been coated with adhesive. This process generates ozone emissions at a rate of 1.3 lbs per year and is exhausted through emission point EP003.

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: MARK F PASSUITE
 NYSDEC - REGION 9
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / ___

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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- 5 5 Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3

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

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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

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: TMP TECHNOLOGIES INC
1200 NORTHLAND AVE
BUFFALO, NY 14215-3835

Facility: TRS Packaging Inc
Dona St
Lackawanna, NY 14218

Authorized Activity By Standard Industrial Classification Code:
5199 - NONDURABLE GOODS, NEC

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FEDERALLY ENFORCEABLE CONDITIONS

FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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required to operate such device effectively.

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial

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Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Visible Emissions Limited
Effective between the dates of 11/14/2019 and 11/13/2029

Applicable Federal Requirement:6 NYCRR 211.2

Item 1.1:

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

Condition 2: Compliance Demonstration
Effective between the dates of 11/14/2019 and 11/13/2029

Applicable Federal Requirement:6 NYCRR 228-2.4 (a)

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

TRS Packaging is proposing to use 2 different adhesives, Swiftlock 9092 and Wisdom PR134, to bond together foam sheets. This type of adhesive has a limit of 250 g/L VOC content as per 6 NYCRR 228-2.4(a) for adhesives used to contact bond specialty substrates. These adhesives are compliant with the Part 228-2 VOC content limit.

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If other commercial or industrial adhesives, sealants, adhesive primers or sealant primers are to be used or the VOC content of the current adhesives changes 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.

Records demonstrating compliance with the VOC content limits shall be maintained on site and include, but not limited to, the following information:

- (1) a list of each commercial and industrial adhesive, 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.

All records made to determine compliance with Subpart 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.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: ADHESIVE

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 250 grams per liter

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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STATE ONLY ENFORCEABLE CONDITIONS****** Facility Level ********NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

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

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.

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Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 3: Contaminant List
Effective between the dates of 11/14/2019 and 11/13/2029

Applicable State Requirement: ECL 19-0301

Item 3.1:

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

CAS No: 000050-00-0
 Name: FORMALDEHYDE

CAS No: 000101-68-8
 Name: METHYLENE BISPHENYL ISOCYANATE

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

Condition 4: Malfunctions and start-up/shutdown activities

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Effective between the dates of 11/14/2019 and 11/13/2029

Applicable State Requirement:6 NYCRR 201-1.4**Item 4.1:**

(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 5: Emission Unit Definition

Effective between the dates of 11/14/2019 and 11/13/2029

Applicable State Requirement:6 NYCRR Subpart 201-5**Item 5.1:**

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

Emission Unit: 1-FOAMA

Emission Unit Description:

This emission unit consists of the three (3) active

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emission points at the facility including EP 001, EP 002 and EP 003. All three (3) active EPs are related to the foam manufacturing processes and involve VOC, HAPs or Ozone.

Building(s): 1

**Condition 6: Renewal deadlines for state facility permits
Effective between the dates of 11/14/2019 and 11/13/2029**

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

Item 6.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Condition 7: Compliance Demonstration
Effective between the dates of 11/14/2019 and 11/13/2029**

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

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 8: Air pollution prohibited
Effective between the dates of 11/14/2019 and 11/13/2029**

Applicable State Requirement:6 NYCRR 211.1

Item 8.1:

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.

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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 9: Compliance Demonstration
Effective between the dates of 11/14/2019 and 11/13/2029

Applicable State Requirement: 6 NYCRR 212-1.6 (a)

Item 9.1:

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

Emission Unit: 1-FOAMA	Emission Point: EP001
Emission Unit: 1-FOAMA	Emission Point: EP002
Emission Unit: 1-FOAMA	Emission Point: EP003
Regulated Contaminant(s):	
CAS No: 0NY998-00-0	VOC

Item 9.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies monthly while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated

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with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

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

Parameter Monitored: OPACITY
 Upper Permit Limit: 20 percent
 Reference Test Method: METHOD 9
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 6 MINUTE AVERAGE
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2020.
 Subsequent reports are due every 12 calendar month(s).

Condition 10: Compliance Demonstration
Effective between the dates of 11/14/2019 and 11/13/2029

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

Item 10.1:

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

Emission Unit: 1-FOAMA	
Process: SCR	Emission Source: PRES1
Emission Unit: 1-FOAMA	
Process: SCR	Emission Source: PRES2
Emission Unit: 1-FOAMA	
Process: SCR	Emission Source: PRES3
Regulated Contaminant(s):	
CAS No: 000050-00-0	FORMALDEHYDE

Item 10.2:

Compliance Demonstration shall include the following monitoring:

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

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Monitoring Description:

A single stage vertical packed tower wet scrubber, utilizing Sodium Hydroxide (NaOH) and Sodium Hypochlorite (NaCl), will be installed and operational to control Formaldehyde emissions to a minimum of 99% at all times as required by 6 NYCRR Part 212-2.3(a) Table 3 "Degree of Air Cleaning Required for Criteria Air Contaminants" for an "A" environmental rating at an emission rate potential of more than 1 but no more than 10 pounds per hour. Compliance will be assured by surrogate parametric monitoring as described below.

The foam presses are designed to be operated within a negative pressure enclosure to capture 100% of the Formaldehyde emissions and exhaust them to a wet scrubber.

The pressure differential shall be continuously monitored during foam pressing operations to maintain negative pressure within the enclosure. Negative pressure shall be determined by monitoring the pressure differential across the enclosure to ensure a minimum pressure drop of 0.007 inches of water.

Within 180 days after initial startup of the foam presses, the capture efficiency of the enclosure shall be verified in accordance with EPA Method 204. A Method 204 protocol shall be submitted to the Department for approval no later than 30 days prior to the verification process and a report of the results shall be submitted to the department no later than 60 days after completion.

All process emission sources, including the associated air pollution control and monitoring equipment shall be operated and maintained in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations. Any significant change or any method of operation which could conceivably increase the emissions or decrease the air cleaning control efficiency may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212. Excursions from the required pressure differential range or any instance where there is reason to believe that Part 212 emissions standards may have been or continue to be exceeded must be investigated and corrected in a timely manner.

Records of monitoring, excursions, investigations and corrective actions will be kept on-site. A summary of these records shall be submitted annually. The summary shall include the daily average and daily minimum pressure drop values.

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Parameter Monitored: PRESSURE DROP
 Lower Permit Limit: 0.007 inches of water
 Reference Test Method: METHOD 204
 Monitoring Frequency: WHEN THE SOURCE IS OPERATING
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
 VALUE AT ANY TIME
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2020.
 Subsequent reports are due every 12 calendar month(s).

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

Condition 11: Emission Point Definition By Emission Unit
Effective between the dates of 11/14/2019 and 11/13/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 11.1:

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

Emission Unit: 1-FOAMA

Emission Point: EP001
 Height (ft.): 38 Length (in.): 34 Width (in.): 26
 NYTMN (km.): 4747.615 NYTME (km.): 185.309

Emission Point: EP002
 Height (ft.): 30 Diameter (in.): 12
 NYTMN (km.): 4747.679 NYTME (km.): 185.267

Emission Point: EP003
 Height (ft.): 30 Diameter (in.): 6
 NYTMN (km.): 4747.679 NYTME (km.): 185.267

Condition 12: Process Definition By Emission Unit
Effective between the dates of 11/14/2019 and 11/13/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 12.1:

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

Emission Unit: 1-FOAMA
 Process: LAM Source Classification Code: 3-14-015-41
 Process Description:

Lamination process involving use of PUR adhesive that contains approximately 1-5% by weight MDI. The adhesive is applied by a mechanical roller to bond melamine foam to polyurethane foam. The adhesive is heated to 260 Degrees

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Fahrenheit.

Emission Source/Control: LAMIN - Process

Design Capacity: 900 cubic feet per minute

Item 12.2:

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

Emission Unit: 1-FOAMA

Process: OZO

Source Classification Code: 3-16-050-03

Process Description:

The corona treater is used to increase the surface tension of the plastic film. The treater converts standard 60Hz power to a high frequency power which is applied to the surface of the material by way of electrodes. The treated side of the material provides increased surface tension for improved adhesion of our adhesive and a stronger lamination strength. After the Corona treating the film is applied to a piece of melamine foam that has been coated with adhesive. This process generates ozone emissions.

Emission Source/Control: OZONE - Process

Design Capacity: 222 cubic feet per minute

Item 12.3:

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

Emission Unit: 1-FOAMA

Process: SCR

Source Classification Code: 3-08-008-01

Process Description:

3 foam presses perform the foam compressing process where BASOTECT melamine-formaldehyde-polycondensate foam sheets are placed in a heated (550F) press and clamped for two to three minutes. This process generates formaldehyde. The 3 presses will be in a permanent total enclosure, and emissions of Formaldehyde from all 3 presses will be captured and sent to a wet scrubber.

Emission Source/Control: SCRUB - Control

Control Type: WET SCRUBBER

Emission Source/Control: PRES1 - Process

Emission Source/Control: PRES2 - Process

Emission Source/Control: PRES3 - Process

Condition 13: Compliance Demonstration

Effective between the dates of 11/14/2019 and 11/13/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

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Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FOAMA

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Department shall be notified, in writing, at least 30 days prior to the commencement of operations of the permitted equipment at the facility. The notice shall include a list of the permitted emission sources, processes and control equipment that will commence operation and the scheduled start-up date for each piece of equipment.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 14: Compliance Demonstration
Effective between the dates of 11/14/2019 and 11/13/2029

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

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FOAMA	Emission Point: EP001
Process: SCR	Emission Source: SCRUB

Regulated Contaminant(s):
 CAS No: 000050-00-0 FORMALDEHYDE

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A single stage vertical packed tower wet scrubber, utilizing Sodium Hydroxide (NaOH) and Sodium Hypochlorite (NaCl), will be installed and operational to control Formaldehyde emissions to a minimum of 99% at all times as required by 6 NYCRR Part 212-2.3(a) Table 3 "Degree of Air Cleaning Required for Criteria Air Contaminants" for an "A" environmental rating at an emission rate potential of more than 1 but no more than 10 pounds per hour. The wet scrubber shall be operated at all times the foam pressing processes are in operation.

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Within 180 days after initial startup of foam pressing process and the wet scrubber a stack test shall be performed to determine the wet scrubber removal efficiency. A stack test protocol shall be submitted to the Department for approval no later than 30 days prior to the stack test and a report of the stack test results shall be submitted to the department no later than 60 days after the test is complete.

The stack test shall measure inlet and outlet Formaldehyde concentrations to prove 99% removal efficiency. During the stack test the pH, water flow rate and Oxidation-Reduction Potential (ORP) shall be measured to verify operational ranges for these values. The stack test shall be performed during the highest potential formaldehyde emissions as noted by production parameters during the testing.

A record of the stack test protocol and testing results shall be maintained on site.

Lower Permit Limit: 99 percent degree of air cleaning or greater

Reference Test Method: SEE MONITORING DESCRIPTION

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 15: Compliance Demonstration
Effective between the dates of 11/14/2019 and 11/13/2029

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

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FOAMA	Emission Point: EP001
Process: SCR	Emission Source: SCRUB

Regulated Contaminant(s):
 CAS No: 000050-00-0 FORMALDEHYDE

Item 15.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A single stage vertical packed tower wet scrubber, utilizing Sodium Hydroxide (NaOH) and Sodium Hypochlorite

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(NaCl), will be installed and operational to control Formaldehyde emissions to a minimum of 99% at all times as required by 6 NYCRR Part 212-2.3(a) Table 3 "Degree of Air Cleaning Required for Criteria Air Contaminants" for an "A" environmental rating at an emission rate potential of more than 1 but no more than 10 pounds per hour. Compliance will be assured by surrogate parametric monitoring as described below.

The Oxidation-Reduction Potential (ORP) of the sump liquor will be continuously monitored in the scrubber. The ORP of the sump liquor must be no less than 600 millivolts but no more than 700 millivolts until a stack test can be performed to verify or better define the operational ORP range. If a new ORP range is required to maintain compliance, then a permit modification shall be required to include the new range.

After initial startup of the foam pressing process and the wet scrubber, the required stack test will determine the ORP range where the wet scrubber has a removal efficiency of 99%. The stack test shall measure inlet and outlet Formaldehyde concentrations to prove 99% removal efficiency.

All process emission sources, including the associated air pollution control and monitoring equipment shall be operated and maintained in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations. Any significant change or any method of operation which could conceivably increase the emissions or decrease the air cleaning control efficiency may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212. Excursions from the required ORP range or any instance where there is reason to believe that Part 212 emissions standards may have been or continue to be exceeded must be investigated and corrected in a timely manner.

Records of monitoring, excursions, investigations and corrective actions will be kept on-site. A summary of these records shall be submitted annually. The summary shall include the daily average, daily minimum and daily maximum ORP values.

Parameter Monitored: OXIDATION REDUCTION POTENTIAL

Lower Permit Limit: 600 millivolts

Upper Permit Limit: 700 millivolts

Monitoring Frequency: WHEN THE SOURCE IS OPERATING

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED

RANGE EXCEPT DURING STARTUP/SHUTDOWN

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Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2020.
 Subsequent reports are due every 12 calendar month(s).

Condition 16: Compliance Demonstration
Effective between the dates of 11/14/2019 and 11/13/2029

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

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FOAMA	Emission Point: EP001
Process: SCR	Emission Source: SCRUB

Regulated Contaminant(s):
 CAS No: 000050-00-0 FORMALDEHYDE

Item 16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A single stage vertical packed tower wet scrubber, utilizing Sodium Hydroxide (NaOH) and Sodium Hypochlorite (NaCl), will be installed and operational to control Formaldehyde emissions to a minimum of 99% at all times as required by 6 NYCRR Part 212-2.3(a) Table 3 "Degree of Air Cleaning Required for Criteria Air Contaminants" for an "A" environmental rating at an emission rate potential of more than 1 but no more than 10 pounds per hour. Compliance will be assured by surrogate parametric monitoring as described below.

The continuous water addition flow rate to the wet scrubber will be monitored twice daily during operation of the wet scrubber. The flow rate must be no less than 68 gallons per hour and no more than 72 gallons per hour until a stack test can be performed to verify or better define the operational flow rate range. If a new flow rate range is required to maintain compliance, then a permit modification shall be required to include the new range.

After initial startup of the foam pressing process and the wet scrubber, the required stack test will determine the water flow rate range where the wet scrubber has a removal efficiency of 99%. The stack test shall measure inlet and outlet Formaldehyde concentrations to prove 99% removal efficiency.

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All process emission sources, including the associated air pollution control and monitoring equipment shall be operated and maintained in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers’ recommendations. Any significant change or any method of operation which could conceivably increase the emissions or decrease the air cleaning control efficiency may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212. Excursions from the required flow rate range or any instance where there is reason to believe that Part 212 emissions standards may have been or continue to be exceeded must be investigated and corrected in a timely manner.

Records of monitoring, excursions, investigations and corrective actions will be kept on-site. A summary of these records shall be submitted annually. The summary shall include the daily average, daily minimum and daily maximum water flow rate values.

Parameter Monitored: FLOW RATE
 Lower Permit Limit: 68 gallons per hour
 Upper Permit Limit: 72 gallons per hour
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED RANGE EXCEPT DURING STARTUP/SHUTDOWN
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2020.
 Subsequent reports are due every 12 calendar month(s).

Condition 17: Compliance Demonstration
Effective between the dates of 11/14/2019 and 11/13/2029

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

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FOAMA	Emission Point: EP001
Process: SCR	Emission Source: SCRUB

Regulated Contaminant(s):
 CAS No: 000050-00-0 FORMALDEHYDE

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

Permit ID: 9-1409-00096/00001

Facility DEC ID: 9140900096

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

A single stage vertical packed tower wet scrubber, utilizing Sodium Hydroxide (NaOH) and Sodium Hypochlorite (NaCl), will be installed and operational to control Formaldehyde emissions to a minimum of 99% at all times as required by 6 NYCRR Part 212-2.3(a) Table 3 "Degree of Air Cleaning Required for Criteria Air Contaminants" for an "A" environmental rating at an emission rate potential of more than 1 but no more than 10 pounds per hour. Compliance will be assured by surrogate parametric monitoring as described below.

The pH of the sump liquor will be continuously monitored in the scrubber. The pH of the sump liquor must be no less than 8.5 units but no more than 9.5 units until a stack test can be performed to verify or better define the operational pH range. If a new pH range is required to maintain compliance, then a permit modification shall be required to include the new range.

After initial startup of the foam pressing process and the wet scrubber, the required stack test will determine the pH range where the wet scrubber has a removal efficiency of 99%. The stack test shall measure inlet and outlet Formaldehyde concentrations to prove 99% removal efficiency.

All process emission sources, including the associated air pollution control and monitoring equipment shall be operated and maintained in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations. Any significant change or any method of operation which could conceivably increase the emissions or decrease the air cleaning control efficiency may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212. Excursions from the required pH range or any instance where there is reason to believe that Part 212 emissions standards may have been or continue to be exceeded must be investigated and corrected in a timely manner.

Records of monitoring, excursions, investigations and corrective actions will be kept on-site. A summary of these records shall be submitted annually. The summary shall include the daily average, daily minimum and daily maximum pH values.

Parameter Monitored: PH

Lower Permit Limit: 8.5 pH (STANDARD) units

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Upper Permit Limit: 9.5 pH (STANDARD) units
 Monitoring Frequency: WHEN THE SOURCE IS OPERATING
 Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED
 RANGE EXCEPT DURING STARTUP/SHUTDOWN
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2020.
 Subsequent reports are due every 12 calendar month(s).

Condition 18: Compliance Demonstration
Effective between the dates of 11/14/2019 and 11/13/2029

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

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FOAMA Emission Point: EP002
 Process: LAM

Regulated Contaminant(s):
 CAS No: 000101-68-8 METHYLENE BISPHENYL ISOCYANATE

Item 18.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall not allow emissions of any High Toxicity Air Contaminant (HTAC) to exceed the limits specified in 6 NYCRR Part 212-2.2 Table 2 – High Toxicity Air Contaminant List. Any proposed increase in any individual HTAC that would result in emissions greater than the values listed in Table 2 shall require a permit modification prior to implementation of such increase.

The limit in Table 2 for Diisocyanate compounds, which includes Methylene Bisphenyl Isocyanate (MDI), is 100 pounds per year. The estimated emissions of Methylene Bisphenyl Isocyanate have been shown to be 0.18 pounds per year from the Lamination process based on a maximum of 200 hrs/yr of operation of this process.

The facility owner or operator shall verify the parameters used to demonstrate compliance with 6 NYCRR Part 212 annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer’s or published emission factors, etc. Emissions of MDI shall be monitored and calculated on an

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annual basis to ensure compliance with the Part 212 limit.

All process emission sources, including the associated air pollution control and monitoring equipment shall be operated and maintained in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations. Any significant change or any method of operation which could conceivably increase the emissions or decrease the air cleaning control efficiency may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212. Excursions from the required ORP range or any instance where there is reason to believe that Part 212 emissions standards may have been or continue to be exceeded must be investigated and corrected in a timely manner.

Records of monitoring, annual MDI calculations, excursions, investigations and corrective actions will be kept on-site. A summary of these records shall be submitted annually.

Parameter Monitored: METHYLENE BISPHENYL ISOCYANATE

Upper Permit Limit: 100 pounds per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL TOTAL

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

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