

Facility DEC ID: 929090007

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

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
 Permit ID: 9-2909-00007/00007
 Effective Date: 07/13/2020 Expiration Date: 07/12/2030

Permit Issued To: CANDLELIGHT CABINetry OPCO LLC
 24 Michigan St
 Lockport, NY 14094

Contact: JOHN YAKICH
 CANDLELIGHT CABINetry INC
 24 MICHIGAN ST
 LOCKPORT, NY 14094
 (716) 434-6543

Facility: CANDLELIGHT CABINetry INC
 24 MICHIGAN ST
 LOCKPORT, NY 14094

Contact: TODD MANCHESTER
 CANDLELIGHT CABINetry INC
 24 MICHIGAN ST
 LOCKPORT, NY 14094
 (716) 434-6543

Description:
 Candlelight Cabinetry, Inc. (CCI) is a manufacturer of wooden kitchen cabinetry systems. Operations performed by the facility include woodworking (sawing, ripping, sanding, etc.) surface coating (including paints, stains, varnishes and glazes), assembly, packaging and shipping. Coatings are applied at the facility both manually using hand-held tools/equipment and by spraying from pressurized spray guns. The facility utilizes several spray booths along with an automated coating machine for application and two natural gas-fired ovens (Cefla oven and Hang-line oven) for curing. The spray booths are equipped with filters designed to capture and control dust. Process emissions from the automated coating machine and select curing operations are controlled by a regenerative thermal oxidizer (RTO) that began operating on January 23, 2019.

This is a permit renewal that updates information at the facility in regards to the facility’s air emission sources. CCI’s ASF permit was last modified in October of 2011 in order to accommodate a proposed expansion project. That project was to include the installation and operation of 13 additional emission points (EP #s 11 - 23) associated with a new water-based coating line referred to as Emission Unit A-00002. Although the water based-coating line was never installed due to changes in demand, two of the related proposed emission points (EP #13– Color Lab and EP #14 – Inspection/Rework Booth) were constructed at that time. Both of these sources remain in operation.

The other emission points that were slated to be added under the previous proposed expansion project (including EP #s 11,12 and 15-23) were never constructed. Minor modifications were

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completed over the past year as part of the facility's efforts to address concerns identified in an Order on Consent issued by the NYSDEC in 2015 (#LER9-15-002628). These modifications included the replacement of the facility's main primer (Sherwin-Williams "Sherwood White Surfacer") with a less hazardous, less toxic alternative (Valspar "Presidium White Primer"), the raising of several existing air stacks (EP #5 raised from 27' to 38', EP #6 raised from 28' to 38', EP #8 raised from 25' to 35', EP #13 raised from 17' to 35.5' and EP #14 raised from 24' to 35.5'), the relocation of EP #13 (moved from southern side of the building to the northern side of building and positioned further to the west) and the installation of an additional spray booth which is currently used for applying specialty finishes and primers (EP #24). Other changes at the facility include the installation of a new spray booth which is used for the coating of oversized items (EP #25) and the installation and operation of a Regenerative Thermal Oxidizer (RTO). The RTO (EP #26) is used to control VOC emissions from several existing sources including the Cefla Automated Spray Coating Machine (currently identified as EP #4), the Flash-Off Chamber associated with the Cefla Curing Oven (currently identified as EP #2) and the Hang-Line Oven (currently identified as EP #7). The emission points currently associated with these sources became inactive (no longer regulated once the RTO was installed. Note: The ventilation systems for the Cefla coating machine and hang-line oven feature atmospheric T-damper assemblies that allow flow to be diverted from the oxidizer to the atmosphere during process startup and maintenance; however no spray coating or curing operations will take place within the affected equipment during those periods. In addition to the various regulated sources noted above, the CCI facility has several emission sources which are considered exempt or trivial according to 6 NYCRR Part 201-3.2 and 3.3. These sources include natural gas combustion installations, manual welding and surface coating operations, air compressors, a paint mixing and storage room and an emergency power generator.

Emissions from the facility were calculated by using mass balance equations and published emission factors presented in USEPA's AP-42 document. The operating data used to calculate the air emissions (hours of operation, product usage, etc.) is based on information compiled for the first half of CY 2018 and anticipated future production levels. Based on the emissions calculations, it was determined that the potential annual VOC emissions from the facility remain above the applicable major source threshold. In that regard, the facility will need to continue to comply with the current VOC emissions cap, as referenced in the existing ASF permit (49.5 tons per year) in order to avoid being subject to 6 NYCRR Part 201-6. The RTO that the facility installed will be used to ensure that the VOC emission levels remain below the cap. The facility is aware that this unit must be properly operated and maintained and that conditional requirements related to this RTO will be enforceable by the Department. The facility will continue to track and record its VOC emissions on a 12 month rolling basis in order to demonstrate compliance. Aside from Total VOCs, all of the other contaminants emitted by the facility were determined to have corresponding PTE levels below the applicable major source threshold limits.

The CCI facility is regulated as a Class C coating line under 6 NYCRR Part 228-1 and has elected to comply with the VOC content limits established in Table C-2 in order to meet the necessary VOC control requirements. All of the coatings currently used by the facility have been evaluated and determined to be compliant with the applicable VOC content limits. A Work Practice Plan to Minimize VOC Emissions from Cleaning and Process Operations related to surface coating has been developed for the facility in accordance with 6 NYCRR Part 228-1.4(c)(4). CCI is also subject to 6 NYCRR Part 228-2, as it uses wood glue and other bonding agents for assembly. These products, which are all classified as contact bond adhesives, are required to have a VOC content of less than 250 grams per liter. Any solvent materials used for surface preparation or clean-up in conjunction with the gluing operations must also meet applicable VOC content or vapor pressure limits established under Subpart 228-2.4(b). Several

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of the contaminants emitted by the facility are identified as Hazardous Air Pollutants (HAPs). Of the various HAPs emitted, only one, formaldehyde, is rated as being high in toxicity according to the NYSDEC's DAR-1 Document.

Formaldehyde is also listed as a High Toxicity Air Contaminant (HTAC) according to 6 NYCRR Subpart 212-2.2 Table 2 and a Persistent, Bioaccumulative and Toxic (PBT) Compound according to 6 NYCRR Part 201-9.1 Table 1. Actual emissions of this contaminant were determined to be below the applicable emission rate limit presented in each of the corresponding regulations. Methylene Chloride is another HAP emitted by the facility that is currently listed as a PBT Compound. The emissions of this contaminant were also determined to be below the applicable emission rate limit presented in 6 NYCRR Part 201-9.1. Emissions of HTAC/PBT Compounds that meet the applicable emission rate limit are considered to be compliant with Part 212. There are also several VOC contaminants emitted from the facility's surface coating operations which have either a low or moderate toxic rating according to DAR-1. These contaminants are presumed to have an environmental rating of B or C. As per 6 NYCRR Part 212-1.4(l)(1), process emission sources subject to table 1 of Subpart 228-1 or process emission sources exempt from Subpart 228-1 pursuant to section 228-1.1(b), only with respect to emissions of VOCs that are not given an A rating are not subject to 6 NYCRR Part 212. One of the contaminants emitted from the facility's gluing operations, Ethyl-2-cyanoacrylate, is included in DAR-1 but does not have a corresponding toxicity rating. As per NYSDEC guidance, this contaminant is assumed to be moderately toxic and thus, is expected to have an environmental rating of B. As per 6 NYCRR Part 212-1.4(l)(3), adhesives, sealants or primers subject to Subpart 228-2, only with respect to emissions of VOCs that are not given an A rating are not subject to 6 NYCRR Part 212.

Facility will track and record VOC emissions from all emission units on a 12-month rolling basis to ensure compliance with the cap of 99,000 pounds per year of VOCs. A written certification that the facility has operated in accordance with the cap will be sent to the Department annually, by January 31st each year, and will include an emissions summary with comparison to applicable limits.

The CCI facility owns and operates an emergency generator which is used to provide electricity to the facility's office area during power outages. The generator is fueled by natural gas. Although this equipment is considered to be exempt from permitting under 6 NYCRR Part 201, the generator is regulated under the USEPA's 40 CFR 63, Subpart ZZZZ rule (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion). The facility is required to operate and maintain the generator in accordance with the standards and requirements outlined in this regulation. The CCI facility is currently classified as a minor (area) source of HAPs emissions and is therefore not subject to 40 CFR 63 Subpart JJ (National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations) at this time.

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.

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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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DEC GENERAL CONDITIONS

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- 7 3 Applications for permit renewals, modifications and transfers
- 8 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 8 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

IDENTIFICATION INFORMATION

Permit Issued To: CANDLELIGHT CABINETRY OPCO LLC
24 Michigan St
Lockport, NY 14094

Facility: CANDLELIGHT CABINETRY INC
24 MICHIGAN ST
LOCKPORT, NY 14094

Authorized Activity By Standard Industrial Classification Code:
2511 - WOOD HOUSEHOLD FURNITURE
2599 - FURNITURE AND FIXTURES, NEC
2657 - FOLDING PAPERBOARD BOXES

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- 8 5 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 8 6 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 8 7 6 NYCRR 202-1.1: Required Emissions Tests
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- 21 23 40CFR 63, Subpart ZZZZ: Applicability

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- 23 25 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
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NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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required to operate such device effectively.

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

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

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

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

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial

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Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 07/13/2020 and 07/12/2030

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: Maintenance of Equipment
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable Federal Requirement:6 NYCRR 200.7

Item 2.1:

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 3: Recycling and Salvage
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 3.1:

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 4: Prohibition of Reintroduction of Collected Contaminants to the air

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Applicable Federal Requirement:6 NYCRR 201-1.8

Item 4.1:

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 5: Exempt Sources - Proof of Eligibility

Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 5.1:

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 6: Trivial Sources - Proof of Eligibility

Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 6.1:

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 7: Required Emissions Tests

Effective between the dates of 07/13/2020 and 07/12/2030

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 7.1:

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 8: Facility Permissible Emissions

Effective between the dates of 07/13/2020 and 07/12/2030

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 8.1:

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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: 99,000 pounds per year

Name: VOC

Condition 9: Capping Monitoring Condition
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 9.1:

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 Subpart 201-6

Item 9.2:

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

Item 9.3:

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

Item 9.4:

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

Item 9.5:

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

Item 9.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 9.7:

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Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility will track and record VOC emissions from all emission units on a 12-month rolling basis to ensure compliance with limits imposed by the emission cap. A written certification that the facility has operated in accordance with the cap will be sent to the Department annually, by January 31st each year, and will include an emissions summary with comparison to applicable limits.

Parameter Monitored: VOC

Upper Permit Limit: 99000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 10: Visible Emissions Limited
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable Federal Requirement:6 NYCRR 211.2

Item 10.1:

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 31: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 31.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 31.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

Facility must operate the regenerative thermal oxidizer (RTO) at a minimum temperature of 1550 degrees Fahrenheit whenever the Cefla spray coating machine or curing ovens are in operation. The RTO will be operated and maintained in accordance with good engineering practices and manufacturers' recommendations to ensure destruction efficiency of the unit is maintained. The operating temperature of the oxidizer will be continuously measured and monitored by the facility using a built-in monitoring device which will be calibrated and maintained according to manufacturer specifications. Temperature readings will be collected every 15 minutes and recorded on a log or chart. The temperature readings, calibration and maintenance records will be maintained on-site for period of 5 years.

Parameter Monitored: VOC's

Lower Permit Limit: 1550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 32: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 32.1:

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

Emission Unit: A-00003

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

Item 32.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This condition applies to the regenerative thermal oxidizer (RTO).

CCI must assure compliance with the minimum overall VOC removal efficiency rate of 98% for the RTO.

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

Manufacturer's specifications state that the RTO obtains 98% destruction efficiency at a temperature of 1550 degrees Fahrenheit. A performance test determining the destruction efficiency of the oxidizer must be performed, in accordance with 40CFR60, Appendix A, Method 18, 25 and 25A.

Test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date at least 30 days prior to the test date. A test report shall be submitted to the RAPCE within 60 days of test completion. The initial test shall be performed within 120 days of the issuance date of this permit.

Parameter Monitored: VOC

Lower Permit Limit: 98 percent reduction by weight

Reference Test Method: EPA Methods 18, 25, & 25A

Monitoring Frequency: Once every five years

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 11: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

To ensure this, differential pressure gauges associated with spray booths will be monitored daily to determine

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Facility DEC ID: 9290900007

when panel filters on booths need to be replaced. An air flow of less than 100 cubic feet per minute indicates filter replacement is required.

The standard operating pressure drop for paint booth filters is as follows:

EP #4 - Cefla Spray Coating Machine: 0.01 to 1.03 wc

EP #5 - Seal & Prime Booth: 0.01 to 0.3 wc

EP #6 - Booth No. 5: 0.01 to 0.5 wc

EP #8 - Booth No. 3: 0.01 to 0.1 wc

EP #8 - Booth No. 6: 0.01 to 0.05 wc

EP #9 - Booth Nos. 1 & 2: 0.01 to 0.1 wc

EP #10 - Box Booth: 0.01 to 1.0 wc

EP #13 - Color Lab: 0.01 to 0.05 wc

EP #14 - Inspect./Rework Booth: 0.01 to 0.5 wc

EP #24 - Primer & Specialty Finishes Booth: 0.01 to 0.1 wc

EP #25 - Oversized Items Booth: 0.01 to 0.1 wc

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 12.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

No person shall cause or allow emissions having an average opacity of 20 percent or greater for any consecutive six minute period from any emission point subject to this Part into the outdoor atmosphere. The facility owner or operator must observe all emission points, subject to this Part, visible from ground level within the boundaries of the facility at least once each week during daylight hours. Should any visible emissions appear, the facility owner or operator shall determine the cause and immediately make the necessary correction(s). These observations will be recorded in a log book at the facility and shall be made available to the Department upon request. Records will be maintained for a minimum of 5 years. If after corrections are made and any emissions continue to be observed, the facility owner or operator will conduct a Method 9 assessment to determine the degree of opacity. The facility owner or operator will notify the DEC immediately if the Method 9 test indicates that the opacity standard is not met.

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

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: WEEKLY
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2021.
Subsequent reports are due every 6 calendar month(s).

Condition 13: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- (1) The owner or operator of any emission source subject to 6 NYCRR Part 228-1 must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters

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used to determine the actual VOC content of each as applied coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department within 90 days of receiving the request. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department. All records required by this paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 14: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 15: Surface coating application requirements
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 15.1:

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;

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- (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 16: Spray gun exemptions
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable Federal Requirement:6 NYCRR 228-1.4 (c) (2)

Item 16.1:

A facility applying wood finishing coatings using a spray gun must use a high volume low pressure (HVLP) spray gun except in the following instances:

- (i) the coating being applied emits less than 1.0 kg(lb) of solids used;
- (ii) for the touchup and repair;
- (iii) when the spray is automated;
- (iv) when add-on controls are employed; or
- (v) if the cumulative application is less than 5.0 percent of the total gallons of coating applied.

Condition 17: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 17.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility may not use Sealers with VOC contents
greater than 1.9 lb VOC/lb solids.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 1.9 pounds of VOC per pound of
solids

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY

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Facility DEC ID: 9290900007

TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

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

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 may not use Topcoats with VOC contents
greater than 1.8 lb VOC/lb solids.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 1.8 pounds of VOC per pound of
solids

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 19.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility may not use Acid-cured Alkyd Amino
Conversion Varnish Sealers with VOC contents greater than
2.0 lb VOC/lb solids.

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Facility DEC ID: 9290900007

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.0 pounds of VOC per pound of
solids

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 20.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility may not use Acid-cured alkyd Amino Vinyl
Sealers with VOC contents greater than 2.3 lb VOC/lb
solids.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.3 pounds of VOC per pound of
solids

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

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

Item 21.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 21.2:

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Facility shall not use adhesive products with VOC content of greater than 250 grams per liter.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 250 grams VOC per liter

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 22: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable Federal Requirement: 6 NYCRR 228-2.5 (a)

Item 22.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 22.2:

Compliance Demonstration 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, 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;

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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: UPON REQUEST BY REGULATORY AGENCY

Condition 23: Applicability
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 23.1:

Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 subpart ZZZZ.

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

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

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

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

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

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

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

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

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

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

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 24: Contaminant List

Effective between the dates of 07/13/2020 and 07/12/2030

Applicable State Requirement:ECL 19-0301

Item 24.1:

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

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

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

Condition 25: Malfunctions and start-up/shutdown activities

Effective between the dates of 07/13/2020 and 07/12/2030

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

Applicable State Requirement:6 NYCRR 201-1.4**Item 25.1:**

(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 26: Emission Unit Definition**Effective between the dates of 07/13/2020 and 07/12/2030****Applicable State Requirement:6 NYCRR Subpart 201-5****Item 26.1:**

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

Emission Unit: A-00001

Emission Unit Description:

This emission unit is comprised of seven existing spray booths which are used for the surface coating of wooden cabinetry parts and a drying chamber and cooling chamber

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Facility DEC ID: 9290900007

associated with an existing curing oven (Cefla oven). These equipment comprise part of the original coating line that was installed at the facility in 2002.

Building(s): MFG

Item 26.2:

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

Emission Unit: A-00002

Emission Unit Description:

This emission unit is comprised of four spray booths that are used for the surface coating of wooden cabinetry parts. Two of the booths were installed in 2011 under a previous permit modification and one was installed in 2017. The remaining booth is a proposed new spray booth which is scheduled to be constructed in the future.

Building(s): MFG

Item 26.3:

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

Emission Unit: A-00003

Emission Unit Description:

This emission unit consists of a regenerative thermal oxidizer which is used to control VOC emissions from several existing sources including a Cefla automated spray coating machine, a flash-off chamber associated with a vertical curing oven (Cefla oven) and a hang-line curing oven. Emissions from these equipment were previously exhausted directly into the atmosphere through separate stacks/emission points. These points, which were all previously identified as being part of Emission Unit A-00001 are now inactive. Note: The ventilation systems for the Cefla coating machine and hang-line oven include atmospheric T-damper assemblies that allow flow to be diverted from the oxidizer to the atmosphere during process startup and maintenance; however no spray coating, curing or cleaning operations are conducted within the affected equipment during those periods.

Building(s): MFG

Item 26.4:

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

Emission Unit: A-00004

Emission Unit Description:

This emission unit is associated with the facility's gluing operations. These operations are of the cabinet assembly process and involve the application of glues and adhesives to wooden cabinetry parts via spraying (from pressurized canister) or manual methods. Emissions from these operations (VOCs) are classified as fugitive and are

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

presumed to be released to the atmosphere through the facility's general ventilation system. The spray adhesive used by the facility (product classified as a contact bond adhesive) is subject to applicable VOC content limits set forth in 6 NYCRR Part 228-2. The other adhesives products that are currently in use are considered to be exempt from Subpart 228-2 due to their low VOC content.

Building(s): MFG

**Condition 27: Renewal deadlines for state facility permits
Effective between the dates of 07/13/2020 and 07/12/2030**

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

Item 27.1:

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 28: CLCPA Applicability
Effective between the dates of 07/13/2020 and 07/12/2030**

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

Item 28.1:

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

**Condition 29: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030**

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

Item 29.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 29.2:

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

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 30: Air pollution prohibited
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable State Requirement:6 NYCRR 211.1

Item 30.1:

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 33: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable State Requirement:6 NYCRR 228-2.4 (b)

Item 33.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 33.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The facility shall use cleanup solvents with a composite
vapor pressure less than 45 mm Hg at 20 degrees Celsius.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: COMPOSITE VAPOR PRESSURE

Upper Permit Limit: 45 millimeters of mercury

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

DESCRIPTION
 Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
 TIME (INSTANTANEOUS/DISCRETE OR GRAB)
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 34: Compliance Demonstration
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable State Requirement:6 NYCRR 228-2.4 (b)

Item 34.1:
 The Compliance Demonstration activity will be performed for the Facility.

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

Item 34.2:
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
 OPERATIONS

Monitoring Description:
 Facility shall limit the VOC content of surface
 preparation solvent used to 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: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION
 Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
 TIME (INSTANTANEOUS/DISCRETE OR GRAB)
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 35: Emission Point Definition By Emission Unit
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 35.1:
 The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: A-00001

 Emission Point: 00001
 Height (ft.): 25 Diameter (in.): 3
 NYTMN (km.): 4786.1 NYTME (km.): 198.1 Building: MFG

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

Emission Point: 00002			
Height (ft.): 30	Length (in.): 12	Width (in.): 12	
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00003			
Height (ft.): 25	Diameter (in.): 3		
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00004			
Height (ft.): 30	Length (in.): 36	Width (in.): 16	
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00005			
Height (ft.): 37	Diameter (in.): 30		
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00006			
Height (ft.): 39	Diameter (in.): 30		
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00007			
Height (ft.): 30	Diameter (in.): 14		
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00008			
Height (ft.): 35	Diameter (in.): 30		
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00009			
Height (ft.): 28	Diameter (in.): 30		
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00010			
Height (ft.): 43	Diameter (in.): 30		
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	

Item 35.2:

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

Emission Unit: A-00002			
Emission Point: 00011			
Height (ft.): 30	Diameter (in.): 30		
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00012			
Height (ft.): 30	Diameter (in.): 30		
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG	
Emission Point: 00013			
Height (ft.): 36	Diameter (in.): 14		

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00014		
Height (ft.): 36	Diameter (in.): 16	
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00015		
Height (ft.): 30	Diameter (in.): 24	
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00016		
Height (ft.): 30	Length (in.): 36	Width (in.): 16
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00017		
Height (ft.): 30	Length (in.): 36	Width (in.): 16
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00018		
Height (ft.): 30	Length (in.): 12	Width (in.): 12
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00019		
Height (ft.): 30	Diameter (in.): 14	
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00020		
Height (ft.): 30	Diameter (in.): 14	
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00021		
Height (ft.): 30	Diameter (in.): 30	
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00022		
Height (ft.): 30	Diameter (in.): 30	
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00023		
Height (ft.): 30	Diameter (in.): 30	
NYTMN (km.): 4786.1	NYTME (km.): 198.1	Building: MFG
Emission Point: 00024		
Height (ft.): 36	Diameter (in.): 14	
NYTMN (km.): 4786.133	NYTME (km.): 198.342	Building: MFG
Emission Point: 00025		
Height (ft.): 35	Diameter (in.): 30	
NYTMN (km.): 4786.133	NYTME (km.): 198.342	Building: MFG
Emission Point: 0008A		
Height (ft.): 30	Diameter (in.): 30	

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

NYTMN (km.): 4786.1 NYTME (km.): 198.1 Building: MFG
 Emission Point: 0010A
 Height (ft.): 30 Diameter (in.): 30
 NYTMN (km.): 4786.1 NYTME (km.): 198.1 Building: MFG

Item 35.3:

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

Emission Unit: A-00003
 Emission Point: 00026
 Height (ft.): 45 Diameter (in.): 30
 NYTMN (km.): 4786.133 NYTME (km.): 198.342 Building: MFG

Condition 36: Process Definition By Emission Unit
Effective between the dates of 07/13/2020 and 07/12/2030

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 36.1:

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

Emission Unit: A-00001
 Process: 001 Source Classification Code: 4-02-019-01
 Process Description:

This process involves surface coating of wooden cabinetry parts via spraying at seven existing spray booths. The coatings applied at these booths include paints (primer and topcoat), stains, sealer, varnish and lacquer. The parts are air dried after being coated. Each booth is equipped with a set of filters that are designed to control particulate emissions. Differential pressure gauges are used to determine when the filters must be changed.

Emission Source/Control: 00003 - Control
 Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00005 - Control
 Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00007 - Control
 Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00010 - Control
 Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00012 - Control
 Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00014 - Control

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00016 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00018 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0001C - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0002C - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0003C - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0004C - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0005C - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00002 - Process

Emission Source/Control: 00004 - Process

Emission Source/Control: 00006 - Process

Emission Source/Control: 00009 - Process

Emission Source/Control: 00011 - Process

Emission Source/Control: 00013 - Process

Emission Source/Control: 00015 - Process

Emission Source/Control: 00017 - Process

Emission Source/Control: 0001S - Process

Emission Source/Control: 0002S - Process

Emission Source/Control: 0003S - Process

Emission Source/Control: 0004S - Process

Emission Source/Control: 0005S - Process

Item 36.2:

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

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

Emission Unit: A-00001

Process: 01A

Source Classification Code: 4-02-019-01

Process Description:

This process involves the heat curing of wood coatings inside a vertical oven. The coatings are applied to wooden cabinetry parts using an automated spray coating system. The coated parts are then transferred to the oven where they are heated to promote curing. The oven is fired by natural gas and contains three separate chambers each outfitted with its own exhaust vent. The first chamber serves as a "flash-off" area. VOC emissions generated inside this chamber are conveyed to a regenerative thermal oxidizer (EP #27). The other two chambers are used for drying and cooling. Emissions from these chambers are discharged directly into the atmosphere through separate stacks (EP #1 and EP #3).

Emission Source/Control: 0001S - Process

Item 36.3:

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

Emission Unit: A-00002

Process: 002

Source Classification Code: 4-02-019-01

Process Description:

This process involves surface coating of wooden cabinetry parts via spraying at four spray booths. The coatings applied at these booths consist of paints (primer and topcoat) and glazes. The parts are air dried after being coated. Each booth is equipped with a set of filters that are designed to control particulate emissions. Differential pressure gauges are used to determine when the filters must be changed.

Emission Source/Control: 0006C - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0007C - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0008C - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0009C - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0006S - Process

Emission Source/Control: 0007S - Process

Emission Source/Control: 0008S - Process

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007

Emission Source/Control: 0009S - Process

Item 36.4:

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

Emission Unit: A-00003

Process: 003

Source Classification Code: 4-02-019-01

Process Description:

This process involves the thermal oxidation of VOCs using a regenerative thermal oxidizer. The oxidizer is fueled by natural gas and is used specifically to control air emissions from an automated spray coating machine and curing operations.

Emission Source/Control: RTO01 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 0010S - Process

Emission Source/Control: 0011S - Process

Emission Source/Control: 0012S - Process

Item 36.5:

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

Emission Unit: A-00004

Process: 004

Source Classification Code: 4-02-019-01

Process Description:

This process involves the application of glues and adhesives to wooden cabinetry parts via spraying (from pressurized canisters), squeezing from hand-held bottles or tubes and other manual techniques.

Emission Source/Control: 0013S - Process

Permit ID: 9-2909-00007/00007

Facility DEC ID: 9290900007