

Facility DEC ID: 9290900156

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2909-00156/00001
Effective Date: 02/10/2025 Expiration Date: 02/09/2035

Permit Issued To: VIRTUAL POLYMER COMPOUNDS LLC
2410 N FOREST RD
GETZVILLE, NY 14068

Contact: Jeff Minner
2410 N Forest Rd
Getzville, NY 14068
(716) 696-0249

Facility: VIRTUAL POLYMER COMPOUNDS LLC
222 S Niagara St
Lockport, NY 14094

Description:

Virtual Polymer Compounds LLC. (VPC) is a manufacturer of a variety of custom fiberglass reinforced products including but not limited to fans, ductwork, louvers, enclosures, tanks, manholes, stairs, benches etc. The primary raw materials used in these processes include vinylester and polyester resins, fiberglass, gel coats (thermosetting polymers) and small quantities of urethane based surface coatings for finishing of certain products. VPC has purchased the former Metal Cladding Inc manufacturing facility and will be consolidating its production activities in this facility. This facility will be fabricating fiberglass reinforced plastic (FRP) products via chopped, wound and manual molding techniques. There will be four exhaust systems dedicated to the FRP production areas, VPC will also be applying surface coatings to some of their products. The surface coating activities and curing of coatings will be performed in five (5) spray booths and three (3) ovens formerly operated by Metal Cladding and retained by VPC.

This facility emits Hexamethylene Diisocyanate, a high toxicity air contaminant (HTAC) as identified by Table 2 in 6 NYCRR 212-2.2. Actual annual emissions of Hexamethylene Diisocyanate were demonstrated to be below 100 lbs/yr, the mass emission limit (MEL) established in 6 NYCRR 212-2.2. The facility shall ensure emissions of Hexamethylene Diisocyanate stay below 100 lbs/yr. The facility submitted an AERMOD dispersion modeling report dated June 20, 2022, that demonstrated compliance with Part 212 by documenting that the expected offsite air concentrations for each of the mentioned contaminants are below the respective AGCs and/or SGCs.

The facility emits over 100 pounds per year of each of the following non-HTAC hazardous air pollutants (HAPs); Styrene, n-butyl acetate, 1,2,4- trimethyl benzene, Light Aromatic Naphtha and 4-chloro- α,α,α -trifluorotoluene. All five of the listed HAPs emitted by the facility are subject to 6 NYCRR 212-2.3(b) - Degree of Air

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Cleaning Required. All five of the listed HAPs were assigned an Environmental Rating of B or C and determined to have an Emission Rate Potential less than 10 pounds per hour, requiring the facility to demonstrate that the maximum annual guidance concentration (AGC) or short-term guidance concentration (SGC) for each pollutant is not exceeded. The facility submitted an AERMOD dispersion modeling report dated June 20, 2022, that demonstrated compliance with Part 212 by documenting that the expected offsite air concentrations for each of the mentioned contaminants are below the respective AGCs and/or SGCs.

This facility operates a Class B coating line by definition, is located outside of New York City and has actual VOC emissions less than 3 tons per year. Since the actual emission of VOCs are not above 3 tons per year, this facility is not subject to 6 NYCRR Part 228-1 – Surface Coating Processes.

Emissions from the facility are regulated under 6 NYCRR Parts 212-1.6(a) and 212-2.4(b). The facility is restricted from creating emissions which have an average opacity during any six consecutive minutes of 20% or greater. The facility also has a particulate emission limit of 0.050 grains per dry standard cubic foot of exhaust gas. The facility will assure compliance with these particulate standards by following standard operating procedures and manufacturer's recommended maintenance requirements. The facility is required to conduct visible emission observations of all emission points which have the potential to release particulate emissions and taking corrective actions if emissions in excess of the above standards are observed.

Pursuant to the requirements of Section 7(2) and 7(3) of the Climate Leadership and Community Protection Act (CLCPA), the Department has requested and received information regarding the project’s consistency with the CLCPA.

This facility operates various other emissions sources that are exempt from New York State air permitting requirements under 6 NYCRR 201-3.

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: LISA M CZECHOWICZ
NYSDEC - REGION 9
700 Delaware Ave
BUFFALO, NY 14209

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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- 6 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 6 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
700 Delaware Ave.,
Buffalo, NY 14209
(716) 851-7130

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: VIRTUAL POLYMER COMPOUNDS LLC
2410 N FOREST RD
GETZVILLE, NY 14068

Facility: VIRTUAL POLYMER COMPOUNDS LLC
222 S Niagara St
Lockport, NY 14094

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

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

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

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

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial

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Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Visible Emissions Limited
Effective between the dates of 02/10/2025 and 02/09/2035

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 02/10/2025 and 02/09/2035

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

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
 CAS No: 0NY075-00-5 PM-10

Item 2.2:

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 New York State Department of Environmental Conservation (NYSDEC) reserves the right to perform or require the performance of a Method 9 opacity evaluation

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at any time during facility operation.

The Facility shall conduct periodic visual observations of all of its emission points, at a minimum of once a month while the processes are in operation. Normal operation of these processes should not result in visible emissions. If visible emissions (other than condensing moisture or steam) are observed, the facility shall investigate and make any necessary corrections in a timely manner. After corrective actions are complete, an additional visual observation of the emission point shall be made the following calendar day to see if visible emissions are still occurring. If visible emissions (other than condensing moisture or steam) are observed for 2 consecutive calendar days, a Method 9 assessment shall be conducted within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity. The facility shall 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 in a bound logbook and include the date, time, observer's name, weather conditions and a description of the observations (steam, visible emissions, etc...). These records shall be kept on site for a period of 5 years from the date of the last entry. Should NYS DEC determine that the record keeping format is inadequate to demonstrate compliance, it shall provide written notice stating the inadequacies, and the facility shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: METHOD 9

Monitoring Frequency: MONTHLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Compliance Demonstration
Effective between the dates of 02/10/2025 and 02/09/2035

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

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 3.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department. A process emission source emitting an air contaminant and having an emission rate potential (ERP) of less than 10 pounds per hour and an Environmental Rating of B or C must meet the annual and short-term guideline concentrations for the air contaminant at the fence line of the facility.

The facility emits over 100 lb/yr of each of the following air contaminants; Styrene, n-butyl acetate, 1,2,4-trimethyl benzene, Light Aromatic Naphtha and 4-chloro- α,α,α -trifluorotoluene. All five of the listed contaminants emitted by the facility are subject to 6 NYCRR 212-2.3(b) – Degree of Air Cleaning Required. All five of the listed contaminants were assigned an Environmental Rating of B or C and were determined to have an Emission Rate Potential less than 10 lb/hr, requiring the facility to demonstrate that the maximum annual guidance concentration (AGC) or short-term guidance concentration (SGC) for each pollutant is not exceeded. Per 6 NYCRR 212-2.3(b) – Degree of Air Cleaning Required, the offsite air concentration must be below respective AGC and/or SGC for each of the mentioned contaminants.

The facility submitted an AERMOD dispersion modeling report dated June 20, 2022, that demonstrated compliance with Part 212 by documenting that the expected offsite air concentrations for each of the mentioned contaminants are below the respective AGCs and/or SGCs.

The facility owner or operator shall annually verify and document the parameters used to demonstrate compliance with 6 NYCRR Part 212. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control basis to ensure compliance.

All process emission sources 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 may be considered a modification to the permit and will require a reevaluation to ensure

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continued compliance with Part 212.

The facility shall maintain purchase records of all products that contain the above listed contaminants on site for 5 years from the latest entry and be made available to NYSDEC upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration
Effective between the dates of 02/10/2025 and 02/09/2035

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

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
 CAS No: 0NY075-00-5 PM-10

Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The New York State Department of Environmental Conservation (NYS DEC) reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The facility shall conduct compliance verifications annually for all of its processes. These verifications shall include review of pertinent process information including, but not limited to, production rates, process material, air flow rate, control equipment parameters, visible emissions, etc. Virtual Polymer Compounds shall confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the facility will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited

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to process upsets, control device malfunctions or problems, visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site for a period of 5 years. Should the NYS DEC determine that the record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice stating the inadequacies, and Virtual Polymer Compounds shall have 90 days to revise its prospective record keeping format in a manner acceptable to the NYS DEC.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 5: Contaminant List

Effective between the dates of 02/10/2025 and 02/09/2035

Applicable State Requirement: ECL 19-0301

Item 5.1:

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

CAS No: 000100-42-5

Name: STYRENE

CAS No: 000822-06-0

Name: HEXANE, 1,6-DIISOCYANATO-

CAS No: 0NY075-00-5

Name: PM-10

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Condition 6: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 02/10/2025 and 02/09/2035

Applicable State Requirement:6 NYCRR 201-1.4

Item 6.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 7: Emission Unit Definition
Effective between the dates of 02/10/2025 and 02/09/2035

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 7.1:

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

Emission Unit: U-COAT1

Emission Unit Description:

This emission unit consists of eight (8) emission points (four spray booths and four ovens) associated with the surface coating operations. Compliant coatings will be applied in the spray booths and all booths are equipped with high efficiency particulate filters. The ovens are utilized for final curing of the parts in this department.

Building(s): 1

Item 7.2:

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

Emission Unit: U-FRP01

Emission Unit Description:

This emission unit consists of five (5) emission points associated with the FRP molding and finishing operations. Emissions are generated during performance of chopped, wound and manual molding techniques, as well as product curing associated with the FRP manufacturing processes. The process results in the emission of styrene that is present in the FRP resin raw materials used.

Building(s): 1

Condition 8: Renewal deadlines for state facility permits
Effective between the dates of 02/10/2025 and 02/09/2035

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

Item 8.1:

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 9: Compliance Demonstration
Effective between the dates of 02/10/2025 and 02/09/2035

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

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall

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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
 700 Delaware Ave.,
 Buffalo, N.Y. 14209

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Air pollution prohibited
Effective between the dates of 02/10/2025 and 02/09/2035

Applicable State Requirement:6 NYCRR 211.1

Item 10.1:

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 11: Compliance Demonstration
Effective between the dates of 02/10/2025 and 02/09/2035

Applicable State Requirement:6 NYCRR 211.1

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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.

The facility's fiberglass fabrication process uses resins and gel coats with varying styrene concentrations. The facility's maximum hourly styrene emission rate is 4.14

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pounds per hour. The maximum short-term styrene concentration that is expected to occur off-site per AERMOD dispersion modeling is 539 ug/m³. The odor recognition threshold value for styrene is 640 ug/m³. The facility reported an estimated annual usage of styrene containing resin of 103,237 lbs.

All process emission sources 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 in usage of styrene containing coatings or any method of operation which could increase the emissions may be considered a modification to the permit and will require a reevaluation to ensure continued compliance.

The facility shall maintain purchase and usage records of all resins and gelcoats that contain styrene on a monthly basis, along with the percentage of styrene in each resin and gelcoat used. These records shall be maintained on site for 5 years from the last entry and be made available to NYSDEC upon request.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance Demonstration
Effective between the dates of 02/10/2025 and 02/09/2035

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

Item 12.1:

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

Emission Unit: U-COAT1

Regulated Contaminant(s):
 CAS No: 000822-06-0 HEXANE, 1,6-DIISOCYANATO-

Item 12.2:

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

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modification prior to implementation of such increase. The limit in Table 2 for Diisocyanate compounds, which includes Hexamethylene Diisocyanate, is 100 pounds per year. The estimated actual emissions of Hexamethylene Diisocyanate have been shown to be 1.4 pounds per year from facility wide coating processes based on maximum facility production hours of 2,950 hrs/yr.

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, and control basis to ensure compliance with the Part 212 limit.

All process emission sources 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 may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212. 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 Hexamethylene Diisocyanate calculations, excursions, investigations and corrective actions will be kept on site for 5 years from the latest entry and be made available to the NYSDEC upon request.

Parameter Monitored: HEXANE, 1,6-DIISOCYANATO-
 Upper Permit Limit: 100 pounds per year
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: ANNUAL TOTAL
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 13: Process Definition By Emission Unit
 Effective between the dates of 02/10/2025 and 02/09/2035

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 13.1:

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

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Emission Unit: U-COAT1

Process: 002

Source Classification Code: 4-02-001-01

Process Description:

This process encompasses manual spray coating applications of compliant VOC-based coatings on final products. A portion of the parts are subsequently cured in ovens to set the coatings. The process results in the emission of VOCs and HAPs and particulates that are present in the coatings and solvents. Emissions occur primarily in the spray booths and to a lesser degree during the oven curing process.

Emission Source/Control: EC007 - Control

Control Type: PAPER FILTER

Emission Source/Control: EC009 - Control

Control Type: FABRIC FILTER

Emission Source/Control: EC010 - Control

Control Type: PAPER FILTER

Emission Source/Control: EC011 - Control

Control Type: PAPER FILTER

Emission Source/Control: OV006 - Process

Emission Source/Control: OV008 - Process

Emission Source/Control: OV013 - Process

Emission Source/Control: OV014 - Process

Item 13.2:

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

Emission Unit: U-FRP01

Process: 001

Source Classification Code: 3-08-007-20

Process Description:

Fiberglass products are manufactured using chopped, wound and manual molding techniques(e.g., atomized spray application and manual lay-up).

Emission Source/Control: FRP01 - Process

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