

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

Facility Identification Data

Name: Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP
Address: 3 and 26 Werner Schluter Way
Plattsburgh, NY 12901

Owner/Firm

Name: UMR BOARDS PRODUCTION LLC
Address: 26 Werner Schluter Way
Plattsburgh, NY 12901, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: ERIN M DONHAUSER
Address: NYSDEC - REGION 5
232 GOLF COURSE RD
WARRENSBURG, NY 12885-1172
Phone: 518 897 1234

Division of Air Resources:

Name: YASMINI PATEL
Address: 232 GOLF COURSE RD
WARRENSBURG, NY 12885
Phone: 518 623 1200

Air Permitting Facility Owner Contact:

Name: Terry Beyer
Address: 194 Pleasant Ridge Rd
Plattsburgh, NY 12901
Phone: 888 472 4588

Permit Description
Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

UMR Boards Production LLC (UMR) is seeking a NYSDEC Title V Air Facility permit for the combined facilities operated by UMR and Schluter Systems LP (The Kerdi-Board production operation in SSLP generally referred to as KB3) located on Tax parcels 232.-3-10.1 and 232.-3-10.2, and the proposed facility "KB4" located tax parcels 232.-3-18, In the town of Plattsburgh, Clinton county, NY (The "Schluter Systems & UMR Boards Facility" or "Facility").

**Division of Air Resources
Permit Review Report**

**Permit ID: 5-0942-00510/00004
11/03/2025**

UMR, SSLP (KB3) and KB4 (proposed Kerdi-Board line 4) facilities manufacture materials used for building and waterproofing tiled shower and tub installations. The principal products include molded expanded polystyrene (EPS) shower floors (shower trays) and laminated extruded polystyrene (XPS) foam core material (Kerdi-Board) for shower and tub surrounding walls and shaped parts such as benches, niches and curbs. The Kerdi-Board laminating line includes a flexographic printing unit to print product information on the board stock. The molding operation is operated by UMR and the Kerdi-Board operation is operated by Schluter. The facility installed a regenerative thermal oxidizer (RTO) to reduce emissions of Volatile Organic Compounds (VOC) associated with the EPS and XPS foaming processes.

The KB4 facility (or KB4 emission unit) will be operated by Schluter Systems LP and Schluter Systems LP will be responsible for emissions from the KB4 emission unit for compliance purposes. the purpose of the proposed KB4 facility is to replace the processes in the SSLP emission unit with processes that will have lower VOCs emissions.

Attainment Status

Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP is located in the town of PLATTSBURGH in the county of CLINTON.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
-----	-----
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT
-----	-----

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

The subject facilities consist of the building housing the SSLP and UMR processes, A proposed building that will house the operation of KB4, A plant that packages exempt thin set cement (Thin set plant), an R & D facility, the headquarters office building, and associated warehousing.

The facility must maintain a continuous 99% destruction efficiency of VOC in the Regenerative Thermal Oxidizer (RTO) in order to comply with 6NYCRR Part 212-2.3(b).

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

Permit Structure and Description of Operations

The Title V permit for Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP is defined by the following emission unit(s):

Emission unit 20SSLP - SSLP (KB3) operates a laminating line to apply face sheets to a foam core to produce a product called Kerdi-Board. The face sheets are applied with hot melt polyurethane moisture cure adhesive (Hot melt glue). The foam core is an extruded polystyrene (XPS) web that is delivered to the facility in bulk rolls. The rolls are stored in the SSLP facility prior to use in order to age the material to obtain optimal properties for further processing. The foam core is expanded in a hot thermofix press prior to application of the face sheets. A 0.8 MMBTU hot oil heater provides the heat for the thermofix press. SSLP (KB3) includes processes such as Roll storage (connected to the RTO), process laminating, cutting & parts assembly, and SSLP finished goods inventory. The laminating process includes adhesive application, printing, becker saw and erbo dust collector. The adhesive application line includes the addition of the nuisance odor control hood. The cutting & parts assembly process includes panel saw & milling machines, and manual/automated glue stations.

Thermal Oxidizer (DURR RTO) shall be connected to 1-00UMR and 2-0SSLP to control VOC emissions. The process RLS under the 2-0SSLP unit shall be connected to RT002 (RT001). Source/control RT001 (DURR RTO) and RT002 (DURR RTO) are one source/control at the facility. Added as separate emission source/control just for the permitting process.

Emission unit 20SSLP is associated with the following emission points (EP):
00061, 00062, 00063

Process: CPA is located at First Floor, Building SSLP - A portion of the finished Kerdi-Board is cut and milled to dimension and assembled into shaped products.

Process: LAM is located at First Floor, Building SSLP - Laminating line to apply face sheets to a foam core to produce a product called Kerdi-Board. The face sheets are applied with hot melt polyurethane

**Division of Air Resources
Permit Review Report**

**Permit ID: 5-0942-00510/00004
11/03/2025**

moisture cure adhesive (Hot Melt Glue). The foam core is an extruded polystyrene (XPS) web that is delivered to the facility in bulk rolls.

Process: RLS is located at First Floor, Building SSLP - Storage of bulk extruded polystyrene (XPS) web rolls. Storage allows material to age to obtain optimal properties for further processing. The process emissions shall be controlled by the Regenerative Thermal Oxidizer (DURR RTO). Source/control RT001 and RT002 are one source control. Added as separate emission source/control just for the permitting process.

Process: WHS is located at First Floor, Building WHSE - Warehouse storage of product inventory (Fugitive emissions).

Emission unit 3COMBU - Combustion unit consisting of one (1) 10,400,000 BTU/hr boiler (Cleaver Brooks) to produce steam in the UMR molding process, and one (1) 1,672,000 BTU/hr burner in the regenerative thermal oxidizer (RTO) VOC control device. It also includes one hot oil heater (exempt) for the SSLP thermofix process, thirteen (13) utility and backup boilers (exempt), thirteen (13) backup generator and fire pump engines (exempt), and natural gas powered space heaters (exempt).

Emission unit 3COMBU is associated with the following emission points (EP):
00001

Process: COM is located at First Floor, Building UMR - Natural gas combustion for generating steam for use in UMR molding process and as part of the regenerative thermal oxidizer (RTO) for VOC control.

Emission unit 100UMR - UMR uses an expanded polystyrene (EPS) process to form shower trays used in new construction and renovation of bathrooms. The EPS process uses polystyrene beads in the manufacturing process which contain Pentane and ISO-Pentane as the "blowing agent". When exposed to heat the blowing agent expands the beads. Additional heat causes the expanded beads to fuse together to form a closed-cell rigid foam material. UMR has been operating seven (7) molding press previously. UMR will install an eighth (8) molding press with this Title V permit. UMR includes processes such as Silo storage (Beads silo (shall be connected to the RTO)), Eight (8) molding press forming (shall be connected to RTO), pre expander includes pre-expander room, main vessel & fluidized bed pre-expander (shall be connected to the RTO), UMR finished goods inventory includes warehouse, molding press purge and seven (7) dryers.

Thermal Oxidizer (DURR RTO) (1,672,000 Btu/hr burner) shall be connected to 1-00UMR and 2-0SSLP to control VOC emissions. The processes PXP, MLD and SIS, under the 1-00UMR unit, are connected to RT001 (RT002). Source/control RT001 (DURR RTO) and RT002 (DURR RTO) are one source/control at the facility. Added as separate emission source/control just for the permitting process.

Emission unit 100UMR is associated with the following emission points (EP):
00011, 00012, 00013, 00014, 00015, 00016, 00017, 00018, 00019, 00020, 00021, 00022, 00023, 00024, 00025, 00026, 00071

Process: DRY is located at First Floor, Building UMR - Seven (7) Drying chambers to remove residual moisture from molded products.

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

Process: MLD is located at First Floor, Building UMR - Molding machines where higher temperature and moisture provided by a steam boiler complete the expansion and the fusing of the material, and simultaneously applies face sheets to the products. The process emissions shall be controlled by the Regenerative Thermal Oxidizer (DURR RTO). Source/control RT001 and RT002 are one source control. Added as separate emission source/control just for the permitting process.

Process: MLP is located at First Floor, Building UMR - Purge of molding presses.

Process: PXP is located at First Floor, Building UMR - Pre-expansion process that softens the polystyrene beads and starts the expansion process. The process emissions shall be control by the Regenerative Thermal Oxidizer (DURR RTO). Source/control RT001 and RT002 are one source control. Added as separate emission source/control just for the permitting process.

Process: SIS is located at First Floor, Building UMR - Area (Silo Room) where raw beads are stored prior to processing. The process emissions shall be controlled by the Regenerative Thermal Oxidizer (DURR RTO). Source/control RT001 and RT002 are one source control. Added as separate emission source/control just for the permitting process.

Process: WHU is located at First Floor, Building WHSE - Inventory storage of packaged units (finished goods) from SSLP and UMR are transferred to on-site warehouse prior to shipment to retailers or wholesalers (Fugitive emissions). The warehouse is located under UMR unit.

Emission unit 400KB4 - KB4 uses an extruded polystyrene (XPS) process to form Kerdi-Board used in new construction and renovation of bathrooms. The XPS process uses solid polystyrene resin pellets in the manufacturing process. The resin is liquefied in an extruding machine. Blowing agents (Carbon Dioxide, Dimethyl ether and hydrofluoroolefin) are injected into the liquid resin in the extruder. The blowing agents expand the resin into a closed cell rigid foam material which is extruded as raw board stock. The KB4 includes processes such as extrusion, laminating, preliminary sizing and regranulation, cutting & parts assembly, and KB4 finished goods inventory. The laminating process includes sources such as adhesive application (contains 4,4-methylene diphenyl diisocyanate (MDI)) to bond the face sheets to the foam core which is connected to the adhesive odor control, printing, becker saw and erbo dust control. preliminary sizing and regranulation include cut, trim, plan machines and agglomerator. The cutting and sizing area includes some bag house to control particulates. The cutting and parts assembly include panel saw and milling machines, manual/ automated glue stations.

Emission unit 400KB4 is associated with the following emission points (EP):
00081, 00086, 00088

Process: CAP A portion of the finished boards are further processed in secondary operations to build smaller shower features. The boards are cut to smaller dimensions with panel saw and milling equipment (K12PAN), and assembled with polyurethane adhesive (K13GLU) into curbs, benches and niches. The assembled items are packaged and sent to storage for subsequent transport to market. Local dust control exhausts internally. Emissions from this process are treated as fugitive emissions.

**Division of Air Resources
Permit Review Report**

**Permit ID: 5-0942-00510/00004
11/03/2025**

Process: EXT is located at First Floor, Building KB4 - The extrusion process heats raw polystyrene resin and mixes it with a blowing agent. With the application of heat the blowing agents are pressurized within the resin. The pressurized resin is extruded through a die to create a flat expanded foam extrusion board of a desired thickness. For certain products, a thicker board stock is produced by thermobonding (Heat Welding) one piece of the extruded web on top of another piece. Ventilation hoods convey blowing agent gases from the area around the extruder die (K1EXT) and the area around the thermobonding unit (K2THV) to emission Point 00081.

Process: GLU is located at First Floor, Building KB4 - The laminating operation applies facer and fleece face sheets to the extruded boards with adhesive, cuts the boards to final product dimensions and prints product information on the finished boards. The facer and fleece face sheets are applied with polyurethane hot melt moisture cure adhesive. The adhesive is solid at room temperature. It is liquefied in heated drums and pumped into the laminating equipment where it is applied to the substrata with rollers. A ventilation hood (K8ADH) controls odor at the adhesive application module, discharge to emission point 00086. The UV Cured Flexographic printing equipment is enclosed in the printing module (K9PRI) which discharges to emission point 00088. A central dust control unit (K11DC) captures dust from the crosscut saw and lateral cutting and milling equipment that establish the final laminated board dimensions (K10BS). The dust control unit discharges inside the building.

Process: PSR is located at First Floor, Building KB4 - Extruded foam board is cut and milled immediately after extrusion (prior to going into interim storage) and upon coming out of storage. Bulk cut-off and foam dust generated during these cutting and milling operations are captured and returned to the extrusion process for re-use after the recycling process, being combined with raw resin to reduce waste. The recycling system consists of a pneumatic material transport system that accumulates the recovered material into a 'fluff' silo, followed by a re-granulation process and finally stored as useable material in a bulk silo. Two baghouse filters (K4BHA and K4BHB) control emissions from the cutting and milling operations (K6CUT). A third unit (K5RFL), equipped with fiber filter media, control emissions from regranulating/Agglomerating equipment in the recycling room. All of the dust control equipment discharges to emission point 00081.

Title V/Major Source Status

Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP is subject to Title V requirements. This determination is based on the following information:
UMR Boards Production is subject to Title V requirements. This determination is based on the following information.
The facility is a major source of Volatile Organic Compounds (VOC) emissions.

Program Applicability

The following chart summarizes the applicability of Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP with regards to the principal air pollution regulatory programs:

Regulatory Program

Applicability

**Division of Air Resources
Permit Review Report**

**Permit ID: 5-0942-00510/00004
11/03/2025**

PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52.21, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

Division of Air Resources Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

3086	PLASTICS FOAM PRODUCTS
3089	PLASTICS PRODUCTS, NEC

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code

Description

3-01-018-11	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Storage
3-01-018-20	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Polymer Drying
3-01-018-85	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION OTHER NOT CLASSIFIED (POLYURETHANE)
3-01-018-93	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION - RAW MATERIAL STORAGE

Division of Air Resources Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

3-01-018-99	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION
3-02-999-98	PLASTICS PRODUCTION - OTHERS NOT SPECIFIED FOOD AND AGRICULTURE FOOD AND AGRICULTURE - OTHER NOT SPECIFIED Other Not Classified
3-08-008-01	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - PLASTIC FOAM PRODUCTS
3-08-008-02	EXPANSION PROCESS VIA STEAM RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - PLASTIC FOAM PRODUCTS
3-08-008-03	MOLDING RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - PLASTIC FOAM PRODUCTS BEAD STORAGE

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
102687-65-0	1-CHLORO- 3,3,3- TRIFLUOROPROP -1-ENE	1738159			
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS		51964	10862000	
000630-08-0	CARBON MONOXIDE		39	16542	
007439-92-1	LEAD	120		0.038	
000101-68-8	METHYLENE BISPHENYL ISOCYANATE	10		4	
0NY210-00-0	OXIDES OF NITROGEN		44.3	24000	
0NY075-00-0	PARTICULATES		14.6	6200	
0NY075-00-5	PM-10		3.3	2200	
0NY075-02-5	PM-2.5		14.6	6190	
007446-09-5	SULFUR		1	115	

Division of Air Resources Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

	DIOXIDE		
0NY100-00-0	TOTAL HAP	1580	197
029118--2-4	TRANS-	1738159	
	1,3,3,3-		
	TETRAFLUOROPR		
	OPENE		
0NY998-00-0	VOC	264000	103974

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

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

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

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

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

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

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

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

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

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

Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)

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

Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)

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

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

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit

**Division of Air Resources
Permit Review Report**

**Permit ID: 5-0942-00510/00004
11/03/2025**

must be revised or reopened to assure compliance with applicable requirements.

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

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

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

Item 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)

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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

(1) An emergency occurred and that the facility owner or

Division of Air Resources Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

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

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description

--			
FACILITY	ECL 19-0301	56	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-Dc.48c (a)	46	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-Dc.48c (g) (2)	47	Alternative recordkeeping
FACILITY	40CFR 60-IIII	48	Standards of Performance for Stationary Compression Ignition Internal Combustion

Division of Air Resources Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

FACILITY	40CFR 60-JJJJ	49	Engines Standards of Performance for Stationary Spark Ignition Internal Combustion Engines Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency engines
FACILITY	40CFR 63-ZZZZ.6640 (f)	50	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 64	51	Chemical accident prevention provisions
FACILITY	40CFR 68	18	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	40CFR 82-F	19	Acceptable ambient air quality.
FACILITY	6NYCRR 200.6	1, 20, 21	Maintenance of equipment.
FACILITY	6NYCRR 200.7	10	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.4	57	Recycling and Salvage Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-1.7	11	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-1.8	12	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-3.2 (a)	13	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-3.3 (a)	14	Standard Permit Requirements
FACILITY	6NYCRR 201-6	22, 52, 53	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4	23, 24, 25	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (a) (4)	15	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (a) (7)	2	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4 (a) (8)	16	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4 (c)	3, 4	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (c) (2)	5	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (d) (4)	26	Compliance Certification
FACILITY	6NYCRR 201-6.4 (e)	7	Operational Flexibility
FACILITY	6NYCRR 201-6.4 (f)	27	Operational Flexibility - Protocol
FACILITY	6NYCRR 201-6.4 (f) (2)	28	

Division of Air Resources Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

FACILITY	6NYCRR 201-6.5 (a)	58	State Enforceable Requirements
FACILITY	6NYCRR 202-1.1	17	Required emissions tests.
FACILITY	6NYCRR 202-2.4 (a) (3)	29	Emission statement methods and procedures
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	59	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	30	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.5 (g)	31	Maintain all process emission sources, including the associated air pollution control and monitoring equipment
FACILITY	6NYCRR 212-1.6 (a)	32	Limiting of Opacity
FACILITY	6NYCRR 212-1.7 (a)	33, 34	Emission Testing Using Approved Procedures
FACILITY	6NYCRR 212-1.7 (b) (1)	35	Th exhaust gas temperature from thermal or catalytic oxidizer
FACILITY	6NYCRR 212-2.2	60	High Toxicity Air Contaminants (HTACs)
FACILITY	6NYCRR 212-2.3 (b)	36	Mass Emission Limits State Air Program
FACILITY	6NYCRR 212-2.4 (b)	37, 38, 39	Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 212-3.1 (a) (2)	40	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 212-3.1 (c) (1)	41	RACT applicability for facilities outside of Lower Orange Co and NYC Metro area
FACILITY	6NYCRR 212-3.1 (c) (4) (i)	42	Required Compliance Plans for applicable 212-3 emission sources
FACILITY	6NYCRR 212-3.1 (e)	43	RACT compliance plan control limits for Capture and Control
1-00UMR/00014/MLD	6NYCRR 212-3.1 (f)	54	"Once in always in" provision
FACILITY	6NYCRR 215.2	9	Owners or operators of applicable emission points commences construction after August 15, 1994
FACILITY	6NYCRR 225-1.2 (d)	44	Open Fires - Prohibitions
			Sulfur-in-Fuel Limitation - Distillate Oil

Division of Air Resources Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

FACILITY	6NYCRR 227-1.3 (a)	45	Particulate Emission Standards
2-0SSLP	6NYCRR 228-2.4 (d)	55	Work Practices

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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.

40 CFR Part 68

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP has been determined to be subject to the following regulations:

40 CFR 60.48c (a)

This regulation requires the owner and operator of each affected facility to submit notification of the date of construction or reconstruction, anticipated startup, and actual startup of the facility. The notification must include the following information:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c, or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

40 CFR 60.48c (g) (2)

This regulation allows the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

40 CFR 63.6640 (f)

This condition states the operation requirements for emergency engines.

40 CFR Part 60, Subpart IIII

Subpart IIII applies to new and reconstructed compression ignition reciprocating internal combustion engines. Sources subject to Subpart IIII must comply with emission standards for hydrocarbons, nitrogen oxides, carbon monoxide, and particulate matter.

40 CFR Part 60, Subpart JJJJ

Subpart JJJJ applies to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in §60.4230, paragraphs (a)(1) through (6). Sources subject to Subpart JJJJ must comply with emission standards for nitrogen oxides, carbon monoxide, and volatile organic compounds.

40 CFR Part 64

The facility is required to continuously monitor the temperature of the Regenerative Thermal Oxidizer (RTO) as per a condition, in this permit, cited under 6 NYCRR 212-1.7. In addition to monitoring of the temperature of the RTO, the following will be used to meet the requirements of CAM:

The owner or operator will perform quarterly maintenance shall include inspection and any necessary repair or replacement of control burners, temperature sensors and other elements that could affect oxidizer performance.

Daily visual checks of the flame and burner while the RTO is operating and perform annual inspections of the burner assemblies, blowers, fans, dampers, refractory lining, oxidizer shell, fuel lines, and ductwork.

All equipment shall be installed and maintained in accordance with the manufacturer's

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

instructions and specifications.

The compliance Assurance Monitoring plan shall be reviewed annually and updated or revised as necessary to reflect changes to the facility equipment inventory or operating practices to ensure continuing compliance with applicable regulations.

6 NYCRR 201-6.4

The Expanded Polystyrene Beads (EPS beads) throughput by weight from the UMR unit at this facility shall be limited to no more than 5937 tons during any consecutive 12-month period, rolled monthly. The facility must monitor the throughput from the UMR unit and maintain the monthly and 12-month rolling throughput records. Each 12-month EPS bead throughput total for the UMR unit must be below the permitted limit of 5937 tons.

Based upon emission calculations performed for EPS bead throughput limit, total Volatile Organic Compounds (VOCs) emissions from UMR shall be below 63.1 tons per year (The emission unit PTE from combustion sources and from XPS resin 64.2 tons per year) by maintaining EPS bead throughput below this limit.

The facility must submit an annual report of monthly and 12 month rolling throughput to document compliance with the permitted limit of 5937 tons per year of EPS bead.

The Extruded Polystyrene (XPS) foam throughput by weight from the SSLP (KB3) unit at this facility shall be limited to no more than 4235 tons during any consecutive 12-month period, rolled monthly. The facility must monitor the throughput from the SSLP unit and maintain the monthly and 12-month rolling throughput records. Each 12-month XPS foam throughput total for the SSLP (KB3) unit must be below the permitted limit of 4235 tons.

Based upon emission calculations performed for XPS foam throughput limit, total Volatile Organic Compounds (VOCs) emissions from SSLP (KB3) shall be below 46.7 tons per year by maintaining XPS foam throughput below this limit.

The facility must submit an annual report of monthly and 12 month rolling throughput to document compliance with the permitted limit of 4235 tons per year of XPS foam.

The Extruded Polystyrene (XPS) resin throughput by weight from the KB4 unit at this facility shall be limited to no more than 9656 tons during any consecutive 12-month period, rolled monthly. The facility must monitor the throughput from the KB4 unit and maintain the monthly and 12-month rolling throughput records. Each 12-month XPS resin throughput total for the KB4 unit must be below the permitted limit of 9656 tons.

Based upon emission calculations performed for XPS resin throughput limit, total Volatile Organic Compounds (VOCs) emissions from KB4 shall be below 19.31 tons per year (The emission unit PTE from combustion sources and from XPS resin 21.1 tons per year) by maintaining XPS resin throughput below this limit.

The facility must submit an annual report of monthly and 12 month rolling throughput to document compliance with the permitted limit of 9656 tons per year of XPS resin.

Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 201-6.4 (f) (2)

This section describes the requirements for operational flexibility protocols included in Title V permits. The facility owner or operator may make certain changes to the facility that have been reviewed and approved pursuant to the protocol without first obtaining a permit modification for those changes.

6 NYCRR 201-6.5 (a)

As discussed in the August 11, 2025 Climate Leadership and Community Protection Act (CLCPA) analysis and updated information provided by the applicant on October 9, 2025 for this project, the facility owner or operator shall cease operation of the Kerdi-Board process (Emission Unit 2-0SSLP) within one year of standard/stable operations of KB4 (Emission Unit 4--0KB4), but no later than January 31, 2030.

The facility owner or operator shall provide written notification to the department within 15 days of ceasing operation of Emission Unit 2-0SSLP. Such notification shall include the date operation ceased and provide documentation that the associated equipment has been disconnected or otherwise rendered inoperative.

6 NYCRR 202-2.4 (a) (3)

Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

6 NYCRR 211.1

This regulation requires that 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.

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

6 NYCRR 212-1.5 (g)

This provision requires the facility owner or operator to operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safety, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

6 NYCRR 212-1.6 (a)

This provisions requires that the facility owner or operator not 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 for the emission of uncombined water.

6 NYCRR 212-1.7 (a)

The facility shall conduct a performance test to demonstrate compliance status with the Methylene Bisphenyl Isocyanate (MDI) emission rate limit in accordance with the permit. This performance test must be conducted under worst case operating conditions. Additional testing will be conducted at the discretion of the Department.

The facility must submit a stack test protocol to the Department for approval at least 90 days prior to the testing. the facility must perform stack test based on an approved stack test protocol, and then submit the stack test report for approval, within 60 days of performing the test to the Department.

The facility shall maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

6 NYCRR 212-1.7 (b) (1)

The Regenerative thermal oxidizer (RTO) shall be operated when the associated process equipment is operating. The combustion temperature of RTO must be maintained at a manufacturer's recommended minimum temperature of 1500 degrees Fahrenheit to comply with 6 NYCRR Part 212-2.3(b). Or the combustion chamber temperature of the RTO must be at least as high as the temperature that existed during the last successful stack test. Currently that temperature is 1500-degree F for the RTO.

The combustion temperature shall be monitored and recorded on a continuous basis when the

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

RTO is operating, except during quality assurance and routine maintenance activities. If the one-hour average temperature falls below the specified limit in this condition, it shall be recorded and included in the facility's annual report. If any deviation associated with malfunction or breakdown of the thermal oxidizer occurs for a period of four hours or more which results in excessive emissions, the occurrence must be submitted to NYS DEC in writing within seven (7) days.

All equipment shall be installed and maintained in accordance with the manufacturer's instructions and specifications. The temperature monitoring device will be calibrated in accordance with the manufacturer's specifications. The RTO system shall be inspected annually.

All monitoring, operating, and maintenance records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

6 NYCRR 212-2.2

Methylene Bisphenyl Isocyanate (MDI) emissions from all facility operations shall be limited to less than 10 pounds per year (lb/y) during all consecutive twelve (12) month periods. The MDI limit is based on the Air dispersion modelling submitted by the facility. An emission performance test shall be conducted within 180 days of standard/stable production of KB4 to confirm actual emissions. If the emission rate from the performance testing is found to exceed the original calculated value, the permittee must submit a modification application with Air dispersion modelling to address such exceedance within 60 days for compliance demonstration, and must obtain Department's approval on a method to operate within the 10 pounds per year limit pending review of the application.

Each calendar month, the facility-wide 12-month rolling total for Methylene Bisphenyl Isocyanate (MDI) emissions shall be computed by adding the current monthly MDI emissions to the MDI emissions for the previous 11 months.

The facility shall maintain the purchase and inventory records of all MDI containing materials for all sources updated monthly. Documentation (e.g., certification from the supplier/manufacturer) which lists the parameters used to determine the actual MDI content of each material used shall be maintained as well. Purchase and usage logs, records shall be maintained onsite to verify the material usage and Methylene Bisphenyl Isocyanate (MDI) emissions on a twelve (12)

month total, rolled monthly, basis for all emission sources.

The facility shall submit to the Regional Office of the Department, an annual Methylene Bisphenyl Isocyanate (MDI) emissions report which certifies that the facility has been operated within the limits imposed by the emission cap. The report shall list the monthly MDI emission for each source, the total monthly MDI emissions, the rolling 12-month total MDI emissions for each consecutive month of the calendar year and a comparison to the 10 pounds per year (lb/y) limit for the facility.

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

The owner or operator of the permitted facility shall maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

6 NYCRR 212-2.3 (b)

The facility must maintain a continuous 99% destruction efficiency of VOC in the Regenerative Thermal Oxidizer (RTO) in order to comply with 6NYCRR Part 212-2.3(b).

Within 60 days after achieving the maximum production rate at which processes shall be operated, but not later than 180 days after the processes start up, the facility must conduct a performance test to determine the VOC destruction efficiency for the RTO.

The performance test shall be conducted while operating the process at maximum throughput rate and under normal process control conditions. The process operation during the testing shall represent the conditions that result in highest known concentrations of the target contaminant. During the performance test, process and control operating parameters, Beads and XPS foam throughput, and other pertinent information shall be recorded. The combustion temperature of the RTO shall be continuously recorded throughout the performance test in accordance with this permit.

Emission testing, sampling and analytical determinations shall be conducted in accordance with test methods acceptable to the Department. The facility must submit a stack test protocol to the Department for approval at least 30 days prior to the test. The protocol should include specifics on the material usage and process operation. Stack test report must be submitted to the Department within 60 days after the completion of the test. Additional testing may be required at the Department's discretion.

6 NYCRR 212-2.4 (b)

The facility shall maintain differential pressure for all dust collectors according to manufacturer's specification. Differential pressure shall be checked and recorded weekly. Air blast function shall be inspected and recorded weekly. Ductwork shall be inspected and recorded monthly. The dust collectors filter shall be serviced according to the manufacturer's recommendation.

For SSLP/KB3 ERBO dust collector :Filters shall be serviced when differential pressure reaches 22 mbar.

For Thinset :Filters shall be serviced when differential pressure reaches 9 in H₂O.

Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

6 NYCRR 212-3.1 (a) (2)

This provision states that owners and/or operators of facilities located outside of the the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury or New York City metropolitan area with an annual potential to emit of 100 tons or more of NO_x or 50 tons or more of VOCs must comply with the requirements of this section.

6 NYCRR 212-3.1 (c) (1)

This condition states the requirements for compliance plans for sources subject to 212-3.

6 NYCRR 212-3.1 (c) (4) (i)

This provision states that owners and/or operators of emission points subject to Part 212-3 operating prior to October 20, 1994 must submit a compliance plan to the department. The compliance plan must demonstrate that the VOC emission points are equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent.

6 NYCRR 212-3.1 (e)

e) Any facility that is subject to this section after May 31, 1995 will remain subject to these provisions even if the annual potential to emit NO_x or VOCs later fall below the applicability threshold.

6 NYCRR 212-3.1 (f)

This provision states that owners and/or operators of emission points located at applicable facilities and commence construction after August 15, 1994 must submit a RACT demonstration for nitrogen oxides and VOC emissions with each application for a permit to operate. RACT must be implemented on these emission points when operation commences. A RACT analysis is not required for new emission points with NO_x and VOC emission rate potentials less than 3.0 pounds per hour and actual emissions in the absence of control equipment less than 15.0 pounds per day at facilities located outside of the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury and New York City metropolitan area.

6 NYCRR 225-1.2 (d)

**Division of Air Resources
Permit Review Report**

**Permit ID: 5-0942-00510/00004
11/03/2025**

This subdivision sets the sulfur-in-fuel limitation for distillate oil fired emission sources throughout the State.

6 NYCRR 227-1.3 (a)

This subdivision sets the particulate matter emission standards for subject stationary combustion installations.

6 NYCRR 228-2.4 (d)

This regulation describes the work practices the owner or operator of a facility with total annual actual volatile organic compound emissions of three tons or more must follow to demonstrate compliance with Part 228-2.

Compliance Certification

Summary of monitoring activities at Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	46	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
FACILITY	20	monitoring of process or control device parameters as surrogate
FACILITY	21	monitoring of process or control device parameters as surrogate
FACILITY	23	work practice involving specific operations
FACILITY	24	work practice involving specific operations
FACILITY	25	work practice involving specific operations
FACILITY	4	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
FACILITY	34	intermittent emission testing
FACILITY	35	monitoring of process or control device parameters as surrogate
FACILITY	60	monitoring of process or control device parameters as surrogate
FACILITY	36	intermittent emission testing
FACILITY	37	intermittent emission testing
FACILITY	38	monitoring of process or control device parameters as surrogate
FACILITY	39	monitoring of process or control device parameters as surrogate
FACILITY	44	work practice involving specific operations
FACILITY	45	record keeping/maintenance procedures

Division of Air Resources
Permit Review Report

Permit ID: 5-0942-00510/00004
11/03/2025

2-0SSLP

55

record keeping/maintenance procedures

Basis for Monitoring

Volatile Organic Compounds (VOC) emissions from UMR, SSLP and KB4 shall be controlled by a Regenerative Thermal Oxidizer (RTO) which must meet the control efficiency of 99%. The oxidizer shall be stack tested for compliance at least once per permit term (every five years) and the temperature of the oxidizer shall be recorded during the test. From that point on, the oxidizer must achieve that temperature when the associated processes are running. Temperature will be monitored, and the burner shall be inspected annually in order to achieve desirable control efficiency. Additional parameters of the RTO will be monitored for compliance assurance monitoring. This includes daily and quarterly equipment reviews with an annual overview of the plan.

There is a facility wide VOC emissions limit of 132 tons per year. This is calculated using emissions estimated from all the processes in the facility. The facility is limited to process 5937 tons/year EPS Beads in UMR, 4235 tons/year XPS Foam in SSLP and 9656 tons per year XPS resin in KB4.

The facility is subject to Process Operation General, Allowable and RACT requirements under 6 NYCRR 212. The emissions were modelled based on a conservative estimate of operations which produced the conditional requirements within the permit. This can specifically be found when reviewing the citation involving Methylene Bisphenyl Isocyanate (MDI). The facility has further requirements for opacity, temperature and pressure change.

The facility must also comply with federal requirements for boilers and emergency engines.

Discussed in the August 11, 2025, Climate Leadership and Community Protection Act (CLCPA) analysis prepared by JMT of New York, Inc. for this project, the facility owner or operator shall cease operation of the Kerdi-Board process (Emission Unit 2-0SSLP) on or before December 31, 2027.

The facility owner or operator shall provide written notification to the department within 15 days of ceasing operation of Emission Unit 2-0SSLP. Such notification shall include the date operation ceased and provide documentation that the associated equipment has been disconnected or otherwise rendered inoperative.