



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 8-3420-00010/00103**

**Renewal Number: 3**

**07/27/2018**

**Facility Identification Data**

Name: SAINT-GOBAIN ADFORS AMERICA INC

Address: 14770 EAST AVE

ALBION, NY 14411

**Owner/Firm**

Name: BRAHA NY REALTY ASSOCIATES INC

Address: 97 OCEAN AVE

DEAL, NJ 07723, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Air Permitting Contact:

Name: RONALD PAETH

Address: SAINT-GOBAIN ADFORS AMERICA INC

14770 EAST AVE

ALBION, NY 14411

Phone:5855891080

**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**

Application for renewal of Air Title V Facility.

**Attainment Status**

SAINT-GOBAIN ADFORS AMERICA INC is located in the town of ALBION in the county of ORLEANS.

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.)

<b>Criteria Pollutant</b>	<b>Attainment Status</b>
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



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Carbon Monoxide (CO)	ATTAINMENT
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\* 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:**

This facility manufactures coated fiberglass and polyester fabrics for use in the construction industry.

**Permit Structure and Description of Operations**

The Title V permit for SAINT-GOBAIN ADFORS AMERICA INC 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.

SAINT-GOBAIN ADFORS AMERICA INC is defined by the following emission unit(s):

Emission unit IC0001 - Two small internal combustion engines subject to 40CFR60, Subparts IIII and JJJJ used for emergency power generation only.

Emission unit IC0001 is associated with the following emission points (EP):  
 CI001, SI001

Process: CI1 110 horsepower emergency fire pump fired by diesel oil.

Process: SI1 is located at Building BAY - 70 horsepower emergency generator fired by natural gas to provide power to the RTO bypass fan.

Emission unit F00004 - Fabric forming with fiberglass and polyester threads, and fabric coating and drying occurs in fifty (50) machines within this emission unit. The machines utilize coatings are compliant with 6NYCRR Part 228. As required, a regenerative thermal oxidizer will be used to control process VOC

Emission unit F00004 is associated with the following emission points (EP):



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Process: F02 is located at First, Building BAY - Fabric forming with fiberglass and polyester threads. Process includes fabric coating and drying, and utilizes coatings that are compliant with 6NYCRR Part 228. Emission sources are installed or modified after 4/30/87. Emission sources F00C1, F0GL1 and F0K4A utilize exempt dryers fired by natural gas. A regenerative thermal oxidizer is used to control process VOC emissions and to meet the VOC emissions limit for EU F-00004.

Emission unit B00001 - This unit consists of two (2) natural gas fired 16.75 MMBtu/hr boilers.

Emission unit B00001 is associated with the following emission points (EP):  
000B1

Process: G01 is located at FIRST, Building BAY - 16.75 MMBtu/hr BOILER FIRING NATURAL GAS.

**Title V/Major Source Status**

SAINT-GOBAIN ADFORS AMERICA INC is subject to Title V requirements. This determination is based on the following information:

This facility is an air pollution control Title V major for potential emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP).

**Program Applicability**

The following chart summarizes the applicability of SAINT-GOBAIN ADFORS AMERICA INC with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
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:



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**PSD** Prevention of Significant Deterioration (40 CFR 52, 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.

**RACT** Reasonably Available Control Technology (6 NYCRR Parts 212-3, 226, 227-2, 228, 229, 230, 232, 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.



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**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**

2295	COATED FABRICS, NOT RUBBERIZED
2396	AUTOMOTIVE & APPAREL TRIMMINGS

**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**

1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
2-01-001-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL)
2-01-002-02	Reciprocating INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS
4-02-043-40	Reciprocating SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - FABRIC COATING, DIP COATING DRYING/CURING

**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



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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.

<b>Cas No.</b>	<b>Contaminant</b>	<b>PTE lbs/yr</b>	<b>PTE tons/yr</b>	<b>Actual lbs/yr</b>	<b>Actual tons/yr</b>
000107-21-1	1,2-ETHANEDIOL	19800			
000106-99-0	1,3-BUTADIENE	2885			
000123-91-1	1,4-DIETHYLENE DIOXIDE	3312			
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	2671			
000071-43-2	BENZENE	2291			
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE	108			
000630-08-0	CARBON MONOXIDE	52670			
007440-47-3	CHROMIUM	1			
007440-48-4	COBALT	1			
000100-41-4	ETHYLBENZENE	2287			
000079-06-1	ETHYLENE CARBOXYAMIDE	2671			
000050-00-0	FORMALDEHYDE	8986			
000110-54-3	HEXANE	1096			
000067-56-1	METHYL ALCOHOL	19800			
000091-20-3	NAPHTHALENE	2545			
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	1			
0NY210-00-0	OXIDES OF NITROGEN	62603			
0NY075-00-0	PARTICULATES	4684			
000100-42-5	STYRENE	2885			
007446-09-5	SULFUR DIOXIDE	478			
000108-88-3	TOLUENE	2290			
0NY100-00-0	TOTAL HAP	49800			
000075-01-4	VINYL CHLORIDE	8947			
0NY998-00-0	VOC	267525			
001330-20-7	XYLENE, M, O & P MIXT.	165			

**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.



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**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.

**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



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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 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**





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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 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.



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(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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
FACILITY	ECL 19-0301	62	Powers and Duties of the Department with respect to air pollution control
I-C0001/-/CI1/ICCI1	40CFR 60-IIII.4205(c)	54	Emission Standards - Stationary CI-IC Fire Pump Engines Displacing < 30 liters/cylinder
I-C0001/-/CI1/ICCI1	40CFR 60-IIII.4206	55	Stationary Compression Ignition IC Engines - Duration of Emission Standards
I-C0001	40CFR 60-IIII.4207(b)	53	Stationary Compression Ignition IC Engines - Fuel Requirements beginning October 1, 2010
I-C0001/-/CI1/ICCI1	40CFR 60-IIII.4209(a)	56	Monitoring requirement - Emergency stationary CI-IC engine
I-C0001/-/CI1/ICCI1	40CFR 60-IIII.4211(a)	57	Stationary Compression Ignition Engines - Compliance Requirements
I-C0001/-/CI1/ICCI1	40CFR 60-IIII.4211(b)	58	Stationary Compression Ignition Engines - Compliance Demonstration
FACILITY	40CFR 60-IIII.4211(f)	26	Stationary Compression Ignition IC Engines -



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I-C0001/-/CI1/ICCI1	40CFR 60-IIII.4211(g)	59	Changes to emissions related settings
I-C0001/-/CI1/ICCI1	40CFR 60-IIII.4214(b)	60	Notification, Recordkeeping Requirements -
FACILITY	40CFR 60-IIII.4218	27	Emergency stationary CI-IC engines Stationary Compression Ignition IC Engines -
F-00004/-/F02	40CFR 60-VVV.740(b)	45	applicability of NSPS general provisions Standards of performance for polymeric coating of supporting substrates facilities
F-00004/-/F02	40CFR 60-VVV.744(b)	46	Standards of performance for polymeric coating of supporting substrates facilities -
F-00004/-/F02	40CFR 60-VVV.747(b)	47	monitoring requirements Polymeric coating of supporting substrates facilities -
F-00004/-/F02	40CFR 60-VVV.747(c)	48	reporting and recordkeeping requirements Polymeric coating of supporting substrates facilities -
FACILITY	40CFR 63-A.1(b)(3)	28, 29, 30, 31	reporting and recordkeeping requirements Subpart A Applicability
I-C0001/-/SI1/ICSI1	40CFR 63-ZZZZ.6590(c)	61	Reciprocating Internal Combustion Engine (RICE) NESHAP - Stationary RICE subject to Regulations under 40 CFR Part 60
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	63	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected



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FACILITY	6NYCRR 201-3.2(a)	13	contaminants to the air
FACILITY	6NYCRR 201-3.3(a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	21, 32, 33	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.4(a)(4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)(2)	4	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(d)(4)	22	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(f)	23	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Operational Flexibility
FACILITY	6NYCRR 202-1.1	18	Off Permit Changes
FACILITY	6NYCRR 202-2.1	7	Required emissions tests.
FACILITY	6NYCRR 202-2.5	8	Emission Statements - Applicability
FACILITY	6NYCRR 211.1	24	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 215.2	9	General Prohibitions - air pollution prohibited
B-00001/-/G01	6NYCRR 227-1.3(a)	34	Open Fires - Prohibitions
F-00004	6NYCRR 228-1.3(a)	35	Smoke Emission Limitations.
F-00004	6NYCRR 228-1.3(b)(1)	36	Surface Coating General Requirements- Opacity
F-00004	6NYCRR 228-1.3(b)(2)	37	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3(d)	25	General Requirements - Record Keeping
F-00004	6NYCRR 228-1.4(d)(2)	38	Surface Coating General Requirements- Handling, storage and disposal
F-00004	6NYCRR 228-1.6(a)	39	VOC limits for magnetic wire, metal can, coil, vinyl and fabric
			Surface coating VOC analysis.



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F-00004	6NYCRR 228-1.6(c)	40	Surface coating
F-00004	6NYCRR 231-2	41, 42, 43, 44	access for sampling
			New Source Review in
			Nonattainment Areas
			and Ozone Transport
			Region
F-00004/-/F02/F0GL1	6NYCRR 234.5	49	Prohibition of sale
			or specification
F-00004/-/F02/F0GL1	6NYCRR 234.6	50	Handling, storage and
			disposal of VOCs
F-00004/-/F02/F0GL1	6NYCRR 234.7	51	Recordkeeping
			requirements
F-00004/00GL1/F02/F0GL1	6NYCRR 234.8	52	Opacity

**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



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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 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.



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6 NYCRR 201-6.4 (d) (5)

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.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

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 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

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 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 there 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.



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**Facility Specific Requirements**

In addition to Title V, SAINT-GOBAIN ADFORS AMERICA INC has been determined to be subject to the following regulations:

40 CFR 60.4205 (c)

This requirement applies to stationary compression ignition IC fire pump engines displacing less than 30 liters/cylinder.

40 CFR 60.4206

This requirement mandates that owners or operators of stationary compression ignition IC engines that achieve the emission standards as required in 40 CFR 60.4204 and 4205 maintain the engines according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.

40 CFR 60.4207 (b)

These conditions states the fuel requirements for compression ignition stationary engines with a displacement of less than 30 liters per cylinder

40 CFR 60.4209 (a)

The owner and/or operator of an emergency stationary compression ignition internal combustion engine subject to this subpart is required to install a non-resettable hour meter.

40 CFR 60.4211 (a)

This regulation states that the owner or operator and must comply with the emission standards specified in 40 CFR 60 Subpart IIII and must operate and maintain the stationary compression ignition internal combustion engine and control device according to the manufacturer's written instructions.

40 CFR 60.4211 (b)

This condition specifies compliance deomonstration methods for pre-2007 CI engines and fire pump CI engines.

40 CFR 60.4211 (f)

These conditions state the hour limits for emergency engines operating in nonemergency engine situations

40 CFR 60.4211 (g)

This regulation specifies that any changes made to emissions related settings, not in accordance with manufacturer's requirements, must be tested to ensure that the unit meets the emissions limits.





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40 CFR 60.4214 (b)

Initial notification, reporting, and recordkeeping requirements for owners or operators of a stationary CI internal combustion engine.

40 CFR 60.4218

This condition specifies Table 8 in appendix containing general conditions applicable to this subpart.

40 CFR 60.740 (b)

This condition specifies threshold for applicable requirements of this rule and defines "once in, always in" for this rule.

40 CFR 60.744 (b)

This condition specifies monitoring requirements for facilities using less than 95 Mg of VOC per year.

40 CFR 60.747 (b)

This condition specifies initial reporting requirements for facilities using less than 130 Mg of VOC per year.

40 CFR 60.747 (c)

This condition specifies additional reporting requirements for facilities using less than 130 Mg of VOC per year.

40 CFR 63.1 (b) (3)

Determinations that a source is not subject to a relevant standard (for example because it is an area source and the rule only covers major sources) must be kept for 5 years.

40 CFR 63.6590 (c)

This regulation states that an affected source that is a new or reconstructed stationary RICE located at an area source must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR Part 60 Subpart JJJJ, for spark ignition engines.

6 NYCRR 201-6.4 (f)

This section describes the operational flexibility protocol proposed by the facility. The



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protocol will allow the facility owner or operator to make certain changes at the facility without the need for a permit modification. Changes made pursuant to the protocol must be approved by the Department, and will be rolled into the permit during the next renewal or modification.

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.

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b) (1)

This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (b) (2)

This condition sets record keeping requirements for use of coatings not subject to this Subpart.

6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing



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and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.4 (d) (2)

This condition specifies VOC limits for "Class D" coatings.

6 NYCRR 228-1.6 (a)

This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the regulation.

6 NYCRR 228-1.6 (c)

This citation permits Department personnel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirements.

6 NYCRR 234.5

This regulation requires that a person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity is prohibited by any of the provisions of this Part.

6 NYCRR 234.6

This regulation specifies the following:

An owner or operator of a facility subject to this Part shall not:

- (a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.



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6 NYCRR 234.7

This regulation sets forth the record keeping requirements for facilities subject of the requirements of Part 234.

6 NYCRR 234.8

This regulation requires that emissions from a unit subject to Part 234 shall not have an opacity greater than 10%.

6 NYCRR Subpart 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

**Compliance Certification**

**Summary of monitoring activities at SAINT-GOBAIN ADFORS AMERICA INC:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
I-C0001/-/CI1/ICCI1	54	record keeping/maintenance procedures
I-C0001/-/CI1/ICCI1	55	record keeping/maintenance procedures
I-C0001	53	work practice involving specific operations
I-C0001/-/CI1/ICCI1	56	record keeping/maintenance procedures
I-C0001/-/CI1/ICCI1	57	record keeping/maintenance procedures
I-C0001/-/CI1/ICCI1	58	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
I-C0001/-/CI1/ICCI1	59	record keeping/maintenance procedures
I-C0001/-/CI1/ICCI1	60	record keeping/maintenance procedures
F-00004/-/F02	46	record keeping/maintenance procedures
F-00004/-/F02	47	record keeping/maintenance procedures
F-00004/-/F02	48	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
B-00001/-/G01	34	monitoring of process or control device parameters



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F-00004	35	as surrogate monitoring of process or control device parameters as surrogate
F-00004	36	record keeping/maintenance procedures
F-00004	37	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
F-00004	38	monitoring of process or control device parameters as surrogate
F-00004	39	record keeping/maintenance procedures
F-00004	41	record keeping/maintenance procedures
F-00004	42	monitoring of process or control device parameters as surrogate
F-00004	43	monitoring of process or control device parameters as surrogate
F-00004	44	record keeping/maintenance procedures
F-00004/-/F02/F0GL1	49	record keeping/maintenance procedures
F-00004/-/F02/F0GL1	50	record keeping/maintenance procedures
F-00004/-/F02/F0GL1	51	record keeping/maintenance procedures
F-00004/00GL1/F02/F0GL1	52	monitoring of process or control device parameters as surrogate

**Basis for Monitoring**

Most of the monitoring requirements contained in this permit are based on specific monitoring methods and observations as prescribed in the applicable rules. Facility specific monitoring conditions were written to assure that reliable information is obtained representing the facility's compliance status with the following requirements:

40 CFR 63.1(b)(3), Subpart A

These conditions set facility HAP emissions limits to below the 40CFR63 applicability thresholds and require compliance monitoring and record keeping.

6 NYCRR Part 227-1.3(a)

This condition sets the opacity limit as well as the monitoring and record keeping requirements for the boilers at the facility.

6 NYCRR Part 231-2

These conditions set VOC emission limit for Emission Unit F00004 as well as the control, monitoring and record keeping requirements.