Facility Identification Data
Name: UNICELL BODY COMPANY INC
Address: 575 HOWARD ST
BUFFALO, NY 14206

Owner/Firm
Name: UNICELL BODY COMPANY INC
Address: 571 HOWARD ST
BUFFALO, NY 14206-2103, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
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571 HOWARD ST
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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
This is an application for the renewal of the Air Title V Facility permit for Unicell Body Company Inc. During the renewal process, the title V permit was modified to include the requirements for 40CFR63, Subpart WWWW -National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. In addition, the renewed permit includes several new requirements including 1) 6NYCRR211.2 for the operation of the manufacturing and assembly areas as a permanent total enclosure as specified in USEPA Method 204 to reduce fugitive emissions, 2) 6NYCRR212.9 which requires a stack test to determine the emission rate potential of styrene, methyl methacrylate and total VOCs and an ambient air quality impact (short-term and long term) analysis using the results from the stack test to assess the potential impacts of the

facility's emissions on public health and the environment.

Attainment Status

UNICELL BODY COMPANY INC is located in the town of BUFFALO in the county of ERIE.

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*	MARGINAL 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

Unicell Body Company manufactures van bodies made of fiberglass and installs steel truck bodies made by other manufacturers, including dump bodies, stake bodies and service bodies. The daily production rate at the facility is approximately six fiberglass van bodies. The molding operation for the fiberglass van bodies is the major source of VOC and HAP emissions from the facility, emitting mostly styrene and methyl methacrylate vapors, with a small amount of other VOCs/HAPs. A secondary source of VOC and HAP emissions is the paint shop in which all the truck chassis are undercoated.

To minimize VOC emissions the company uses low pressure, airless spray equipment to spray the polyester gelcoat and polyester resin onto its truck body molds. It contains two emissions units; a fiberglass molding and assembly unit ("A-MOLD") and a painting unit ("B-PAINT"). There is one emission point (EP) for each of these units, "MAIN" and "PAINT", respectively. The main emission sources in the A-MOLD emission unit are fiberglass molds, while the emission source for the B-PAINT emission unit is an undercoat spray booth. To minimize particulate emissions, the company employs a dust collection system on its trimming operations, which is vented indoors and has fiberglass filters on the intakes of the exhaust ducts for EP MAIN and EP PAINT.

Permit Structure and Description of Operations

The Title V permit for UNICELL BODY COMPANY 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.

UNICELL BODY COMPANY INC is defined by the following emission unit(s):
Emission unit 0AMOLD - Emission unit A-MOLD, the main emission unit at the facility, contains all the molding and assembly operations involved in manufacturing Unicell's fiberglass van bodies. The emission sources (ES) within this unit are fiberglass molds, ES 7MOLD and ES PMOLD, and the area in which the truck bodies are assembled on the truck chassis, ASSEM. The processes that take place within ES 7MOLD are SRE, SRN, SGC, MGC, RGC,RRE, CML, WML, BHO, BWA, BMA, CEQ. The processes that take place within ES PMOLD are HRE, HGC, RGC, RRE, CML, WML, BHO, BWA, CEQ. The processes that take place within ASSEM are BMA, STU, HPT,HCK. The pollutants generated at these sources are volatile organic compounds (VOCs), particulates, and hazardous air pollutants (HAPs), including styrene and methyl methacrylate. Particulate emissions generated in ES 7MOLD by Processes SRE, SRN and SGC are controlled via disposable fiberglass/polyester filters with 99% capture efficiency, identified as Emission Source/Control FMOLD. Emissions of VOCs are uncontrolled. This emission unit has a single emission point, MAIN. Unicell also operates a fiberglass trimming process which employs a dust collection system to minimize particulate emissions that is vented indoors.

Emission unit 0AMOLD is associated with the following emission points (EP):
0MAIN
It is further defined by the following process(es):
Process: BHO is located at Building MOLDSHOP - This is the application of urethane adhesive, betaseal, to the interior structure of the truck body. The tool used is a mechanical applicator.
Process: BMA is located at 575 HOWARD STREET, Building MOLDSHOP - This is the application of a methyl methacrylate adhesive, Plexus, to bond together structural components. The tool used is a mechanical applicator.
Process: BWA is located at Building MOLDSHOP - This is the manual application of polyester putty to the front

wall reinforcing of a truck body. The tool used is a putty knife.
Process: CEQ is located at Building MOLDSHOP - This is the cleaning of spray and other application equipment using acetone and lacquer thinners. The tools used are brushes and rags.
Process: CML is located at 575 HOWARD STREET, Building MOLDSHOP - This is the cleaning of a fiberglass mold using mold release TR 210, 211. The tool used is a rag.
Process: HCK is located at Building MOLDSHOP - This is the application of caulking, all-pro acrylic, to the floor/wall joint of a truck body. The tool used is a caulking gun.
Process: HGC is located at 575 HOWARD ST, Building MOLDSHOP - This is the manual application of gelcoat, including catalyst, to a fiberglass mold. The tool used is a paintbrush.
Process: HPT is located at Building ASSEMBLY - This is the manual application of paint to the floor of a truck body. The tool used is a paint roller.
Process: HRE is located at 575 HOWARD STREET, Building MOLDSHOP - This is the manual application of polyester resin, including catalyst, to a fiberglass mold. The tools used are a paintbrush and a steel roller.
Process: MGC is located at 575 HOWARD STREET, Building MOLDSHOP - This is the spray application of gelcoat, including catalyst, to a fiberglass pattern in the construction of a mold. The tool used is a siphon or pressure feed sprayer.

Process: RGC is located at 575 HOWARD STREET, Building MOLDSHOP - This is the manual application of gelcoat, including catalyst, to a part being repaired. The tool used is a putty knife.

Process: RRE is located at 575 HOWARD STREET, Building MOLDSHOP - This is the manual application of polyester resin, including catalyst, to a part being repaired. The tools used are a brush and roller.

Process: SGC is located at 575 HOWARD STREET, Building MOLDSHOP - This is the spray application of gelcoat, including catalyst, to a fiberglass mold. The tool used is a low pressure, airless Venus-Gusmer Pro-Series Gelcoater spray gun. Approximately six molds are gelcoated each day, utilizing 0.75-1.5 hours per unit for the application. Gelcoat and resin can be applied to separate molds simultaneously.

Process: SRE is located at 575 HOWARD STREET, Building MOLDSHOP - This is the robotic spray application of polyester resin, including catalyst, to a fiberglass mold. The tool used is a low pressure, airless Venus-Gusmer H.I.S. Chopper spray gun. Approximately six molds are coated each day, utilizing 0.75-1.5 hours per unit for the application . Gelcoat and resin can be applied to separate molds simultaneously.

Process: SRN is located at 575 HOWARD STREET, Building MOLDSHOP - This is the spray application of resin using a hand-held spray gun, an airless Venus Gusmer H.I.S. chopper spray gun.
Process: STU is located at Building ASSEMBLY - This is the touch up of small blemishes in the truck chassis using small aerosol spray cans.
Process: WML is located at 575 HOWARD STREET, Building MOLDSHOP - This is the application of wax, paste wax TR 100 to a fiberglass mold. The tool used is a rag.

Emission unit BPAINT - This emission unit (EU) consists of a spray booth, identified as Emission Source (ES) BOOTH, in which all of the fiberglass truck bodies and some of the steel truck bodies are undercoated. The pollutants generated at ES BOOTH include volatile organic compounds (VOCs), hazardous air pollutants (HAPs) and particulates. Particulate emissions are controlled via disposable fiberglass/polyester panel filters with 99% capture efficiency, identified as Emission Source/Control FILTR. The processes in this emission unit are SPTand CPT. EU B-PAINT has a single emission point (EP), PAINT.
Emission unit BPAINT is associated with the following emission points (EP):
PAINT
It is further defined by the following process(es):
Process: CPT is located at Building ASSEMBLY - This is the cleaning of the paint spray gun using thinners.

Process: SPT is located at Building ASSEMBLY - This is the application of undercoating to cube vans using a Titan airless spray system, Model LX50.

Title V/Major Source Status
UNICELL BODY COMPANY INC is subject to Title V requirements. This determination is based on the following information:
The facility-wide emissions of styrene exceeds the major source threshold of 10 tons per year for a single HAP listed in 6NYCRR Subpart 201-6 -Title V Facility Permits, therefore Unicell is subject to the provisions of Title V. In addition, Unicell has an annual potential to emit greater than 50 tons of volatile organic compounds (VOCs) from emission sources subject to 6NYCRR Subpart 212.10 - "Reasonably available control technology for major facilities" and 6NYCRR Part 228 - "Surface Coating Processes", Section 228.8, Table 2. Both requirements have an applicability threshold of 50 tons per year (tpy) based on the potential to emit VOCs from all sources at the facility. Unicell has chosen to avoid being subject to the control requirements specified in Subpart 212.10 and Subpart 228.8 by limiting the amount of VOC's emitted from the facility to 49 tons per year determined by summing the individual monthly VOC emissions during any consecutive 12-month period.

Program Applicability
The following chart summarizes the applicability of UNICELL BODY COMPANY 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	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52) - 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 Part 231) - 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) - 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) - 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) - 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) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - 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 212.10, 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) - 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
3713	TRUCK AND BUS BODIES

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorizeprocesses 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
3-08-007-04	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Adhesive Consumption
3-08-007-21	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Gel Coat-Roll On
3-08-007-22	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Gel Coat-Spray On
3-08-007-02	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Mould Release
3-08-007-99	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Other Not Classified
3-08-007-23	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Resin-General-Roll On
3-08-007-24	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Resin-General-Spray On
4-02-016-05	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - AUTOMOBILES AND LIGHT TRUCKS Equipment Cleanup
4-02-016-99	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - AUTOMOBILES AND LIGHT TRUCKS Other Not Classified
4-02-016-20	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - AUTOMOBILES AND LIGHT TRUCKS Repair Topcoat Application Area
4-02-016-07	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - AUTOMOBILES AND LIGHT TRUCKS SURFACE COATING - AUTOS & LIGHT TRUCKS: SEALERS

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series 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 Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). 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 Name	PTE		
		lbs/yr		Range
000107-21-1	1,2-ETHANEDIOL	120000		Z
000108-10-1	2-PENTANONE, 4-METHYL	23000		Z
000098-82-8	BENZENE, (1-METHYLETHYL)	78000		Z
000106-97-8	BUTANE	98000		
000071-36-3	BUTANOL	pteyear		
000131-11-3	DIMETHYL PHTHALATE	pteyear		Y
000067-64-1	DIMETHYL KETONE	pteyear		C
000141-78-6	ETHYL ACETATE	pteyear		
000064-17-5	ETHYL ALCOHOL (ETHANOL)	pteyear		
000100-41-4	ETHYLBENZENE	pteyear		Z
000050-00-0	FORMALDEHYDE	pteyear		
0NY100-00-0	HAP	pteyear		
000110-19-0	ISOBUTYL ACETATE	pteyear		
000067-63-0	ISOPROPYL ALCOHOL	pteyear		
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER		pteyear	
000067-56-1	METHYL ALCOHOL	pteyear		Z
000078-93-3	METHYL ETHYL KETONE	pteyear		Z
000101-68-8	METHYLENE BISPHENYL ISOCYANATE		pteyear	
000110-91-8	MORPHOLINE	pteyear		
064741-41-9	NAPHTHA (PETROLEUM), HEAVY STRAIGHT-RUN			pteyear
064742-88-7	NAPHTHA, MEDIUM ALIPHATIC		pteyear	
0NY075-00-0	PARTICULATES	pteyear		C
007664-38-2	PHOSPHORIC ACID	pteyear		
000074-98-6	PROPANE	pteyear		
064742-89-8	SOLVENT NAPTHA, LIGHT ALIPHATIC		pteyear	
008052-41-3	STODDARD SOLVENT	pteyear		A
000100-42-5	STYRENE	pteyear		
000108-88-3	TOLUENE	pteyear		Y
0NY998-00-0	VOC	pteyear		
001330-20-7	XYLENE, M, O & P MIXT.	pteyear		Y

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;
(3) During the period of the emergency the facility owner and/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 and/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 and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 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 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(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 D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(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 E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(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 F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(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 G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(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 H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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

Item I: Severability - 6 NYCRR Part 201-6.5(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 J: Permit Shield - 6 NYCRR Part 201-6.5(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 K: Reopening for Cause - 6 NYCRR Part 201-6.5(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 L: **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 M: **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: **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	71	Powers and Duties of the Department with respect to air pollution control
0-AMOLD/0MAIN	40CFR 63-A	69	Subpart A - General Provisions apply to all NESHAP affected sources
FACILITY	40CFR 63-A.10	34, 35	Recordkeeping and Reporting
0-AMOLD/0MAIN	40CFR 63-A.6(e)(1)(i)	70	Operation and Maintenance (MACT Gen. Prov.)
0-AMOLD	40CFR 63-A.9(h)(2)(i)	38	
0-AMOLD	40CFR 63-WWWW	39	Reinforced Plastic Composite Production
0-AMOLD	40CFR 63-WWWW.5785	40	Reinforced Plastic Composites NESHAP - Applicability
0-AMOLD	40CFR 63-WWWW.5790	41, 42	Reinforced Plastic Composites NESHAP - Affected Sources Within Facility
0-AMOLD	40CFR 63-WWWW.5805	43, 44, 45, 46	Reinforced Plastic Composites NESHAP - Standards - Table 3 Emission Limits and Table 4 Work Practice Standards
0-AMOLD	40CFR 63-WWWW.5805(b)	47	Reinforced Plastic Composites NESHAP - Standards
0-AMOLD	40CFR 63-WWWW.5810	48	Reinforced Plastic Composites NESHAP - Options For Meeting Open Molding and Centrifugal Casting Operations Standards
0-AMOLD	40CFR 63-WWWW.5810(a)	49	Reinforced Plastic Composite NESHAP - Compliance Options For Open Molding and Centrifugal Casting

			Operations
0-AMOLD	40CFR 63-WWWW.5810(b)	50	Reinforced Plastic Composites NESHAP - Options For Meeting Open Molding and Centrifugal Casting Operations
0-AMOLD	40CFR 63-WWWW.5810(c)	51	Reinforced Plastic Composites NESHAP - Options For Meeting Open Molding and Centrifugal Casting Emission Limits
0-AMOLD	40CFR 63-WWWW.5835	52	Reinforced Plastic Composites NESHAP - General Requirements
0-AMOLD	40CFR 63-WWWW.5895(c)	53	Reinforced Plastic Composites NESHAP - Continuous Compliance Demonstrations
0-AMOLD	40CFR 63-WWWW.5900	54, 55, 56, 57	Reinforced Plastic Composites NESHAP - Continuous Compliance Demonstrations
0-AMOLD	40CFR 63-WWWW.5905	58	Reinforced Plastic Composites NESHAP - Notifications
0-AMOLD	40CFR 63-WWWW.5910(a)	59	Reinforced Plastic Composites NESHAP - Reports
0-AMOLD	40CFR 63-WWWW.5910(b)	60	Reinforced Plastic Composites NESHAP - Reports
0-AMOLD	40CFR 63-WWWW.5910(c)	61	Reinforced Plastic Composites NESHAP - Reports
0-AMOLD	40CFR 63-WWWW.5910(d)	62	Reinforced Plastic Composites NESHAP - Reports
0-AMOLD	40CFR 63-WWWW.5910(g)	63	Reinforced Plastic Composites NESHAP - Reports
0-AMOLD	40CFR 63-WWWW.5915	64, 65, 66	Reinforced Plastic Composites NESHAP - Recordkeeping
0-AMOLD	40CFR 63-WWWW.5920	67	Reinforced Plastic Composites NESHAP - Record Retention
0-AMOLD	40CFR 63-WWWW.5925	68	Reinforced Plastic Composites NESHAP - Subpart A General Provisions
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3	23	
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
FACILITY	6NYCRR 201-1.4	72	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.1(a)	24	Exemptions and Trivial Activities - State Regulated Sources Exempt from Permit
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility

FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	25, 36, 37	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	
FACILITY	6NYCRR 201-6.5(a)(7)	2	
FACILITY	6NYCRR 201-6.5(a)(8)	16	
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)	26	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	17	
FACILITY	6NYCRR 201-6.5(e)	6	
FACILITY	6NYCRR 201-6.5(f)(6)	18	
FACILITY	6NYCRR 201-7	27, 28	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	73, 74	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 212.10	28	NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 212.11(a)	33	
FACILITY	6NYCRR 212.4(c)	29	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.5(a)	30	Applicable emission standards
FACILITY	6NYCRR 212.6(a)	31	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 212.9	32	
FACILITY	6NYCRR 215	9	
FACILITY	6NYCRR 228	28	

Applicability Discussion:

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

ECL 19-301.
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.

6NYCRR Part 200-.6

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

6NYCRR Part 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

6NYCRR Part 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.

6NYCRR Part 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR Part 201-6.5(c)(3)
This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and 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.

6NYCRR Part 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR Part 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.

6NYCRR Part 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 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.

6NYCRR Part 211-.2
This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3
This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215
Prohibits open fires at industrial and commercial sites.

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.

Facility Specific Requirements
In addition to Title V, UNICELL BODY COMPANY INC has been determined to be subject to the following regulations:

40CFR 63-A
The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40CFR63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that descibe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

Section 63.1 relates to general applicability considerations both before and after promulgation of standards for a source category. Section 63.2 contains definitions common to the MACT rules. Section 63.3 contains units and abbreviations used in the MACT rules. Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. Section 63.5 describes how construction or reconstruction trigger requirements for preconstruction review.

Section 63.6 covers compliance issues such as how default new source and existing source compliance dates are calculated for each MACT rule; operation and maintenance requirements; startup, shutdown, and malfunction plan requirements; methods for determining compliance; alternative emission standards; compliance extensions; and compliance exemptions.

Section 63.7 covers performance testing requirements such as default notification and test deadlines; qualty assurance programs: site-specific test plans; test facilities; general test conduct requirements; use of alternative test methods; data analysis, recordkeeping, and reporting; and performance test waivers.

Section 63.8 covers default monitoring requirements for continuous or periodic parameter monitoring, continuous opacity monitoring, and continuous emission monitoring.

Section 63.9 contains default notification requirements and deadlines for initial notifications, requests for extension of compliance, notification that a source is subject to special compliance requirements, continuous monitoring related notifications, and notifications of compliance status (also refered to as initial compliance reports).

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot"

items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

40CFR 63-A.10
Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

40CFR 63-A.6 (e) (1) (i)
Paragraph 63.6(e) requires that affected sources including air pollution control equipment must be operated and maintained to minimize emissions "at least to the level required by all relevant standards." It further requires that this be done at all time including during periods of startup, shutdown, and malfunction (SSM). Also operation during those times must be according to a SSM plan. §63.6(f) indicates however that nonopacity emission standards do not apply during SSM periods. Thus at those times the owner or operator must minimize emissions.

40CFR 63-A.9 (h) (2) (i)
Section 63-A.9(h)(2)(i) specifies that before a title V permit has been issued to the owner or operator of an affected source, and each time a notification of compliance status is required under this part, the owner or operator of the source must submit submit a notification of compliance status, signed by the responsible official who must certify accuracy, attesting to whether the source has complied with the relevant standard. This section includes a list of items that must be included in the notification of compliance status, if applicable.

40CFR 63-WWWW
This section specifies that the facility must verify compliance with 40CFR63, Subpart WWWW in accordance with the final MACT Compliance Plan. If the facility chooses to change the compliance option specified in the Plan, a revised MACT Compliance Plan must be submitted to NYSDEC for review and approval prior to changing the compliance option. The MACT Compliance Plan is considered part of the title V permit.

40CFR 63-WWWW.5785
Section 63.5785 describes the applicability of Subpart WWWW. The facility is subject to Subpart WWWW if the facility owns or operates a reinforced plastic composites production facility that is located at a major source of hazardous air pollutants (HAPs). Reinforced plastic composites production is limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

40CFR 63-WWWW.5790
Section 63.5790 lists the operations at a reinforced plastics production facility that are included and excluded from the requirements of Subpart WWWW.

40CFR 63-WWWW.5805
Section 63.5805 specifies the organic HAP emission limits for new and existing facilities for specific types of operations carried out in reinforced plastic composites production. This existing facility carries out open molding, non-corrosion-resistant and/or high strength (non-CR/HS) operations that are limited to 87 pounds (lb) of HAP per ton of resin for manual resin application, 88 lb of HAP per ton of resin for mechanical resin application, 267 lb HAP per ton of white/off white pigmented gel coating and 377 lb HAP per ton of pigmented gel coating. The facility may elect to comply with these emission limits using any options described in §63.5810-5830.

40CFR 63-WWWW.5805 (b)
All operations at existing facilities that are not listed in §63.5805(a) [centrifugal casting and continuous lamination/casting operations] must meet the organic HAP emission limits in Table 3 of subpart WWWW and the work practice standards listed in Table 4 of subpart WWWW that apply, regardless of the quantity of HAP used

40CFR 63-WWWW.5810
Section 63.5810 requires that the facility use one of the methods listed to meet the standards for open molding or centrifugal casting operations in table 3 or 5 of Subpart WWWW. In accordance with this section , the facility may switch between the compliance options and may use different compliance options for the different operations listed in tables 3 or 5. This section also specifies that any control method that reduces organic HAP emissions may be used, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of the emissions to an add-on control device. Any necessary calculations must be completed within 30 days after the end of each month.

40CFR 63-WWWW.5810 (a)
Section 63.5810 (a) describes a compliance option that the facility may use to determine compliance with the organic HAP emission factors. This option requires the facility to calculate the actual organic HAP emissions factor for each different process stream within each operation type. The facility must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in table 1 of subpart WWWW for open-molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If the calculated emissions factor is less than or equal to the appropriate emission limit, the facility has demonstrated that this process stream complies with the emission limit in table 3.

40CFR 63-WWWW.5810 (b)
Section 63.5810 (b) describes a compliance option that the facility may use to determine compliance with the applicable organic HAP emission factors. This option requires that the facility demonstrate that on average the facility met the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in table 3 of subpart WWWW that applies. The facility must group the process streams described in §63.5810(a) by operation type and resin application method or gel coat type listed in table 3 of subpart WWWW and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months using equation 2 as listed in §63.5810(b)(1). Each organic HAP emission factor calculated above must then be compared with its corresponding organic HAP emission limit in table 3 of subpart WWWW. If all emission factors are equal to or less than the corresponding emission limit, then the facility is in compliance.

40CFR 63-WWWW.5810 (c)
Section 63.5810 (c) describes a compliance option that the facility may use to determine compliance with the applicable organic HAP emission factors. This option requires that the facility demonstrate each month that it meets each weighted average of the organic HAP emission limits in table 3 of subpart WWWW that apply. Each month the facility must calculate the weighted average organic HAP emission limit for all open molding operations for the facility for the last 12-month period to determine the organic HAP emission limit that the facility must meet by using equation 3 listed in §63.5810(c)(1). Each month the facility must then calculate the weighted average organic HAP emission factor for open molding by using equation 4 as listed in §63.5810(c)(2). The facility must then compare the values calculated above and if each 12-month rolling average organic HAP emission factor is less than or equal to the corresponding 12-month rolling average organic HAP emission limit, then the facility is in compliance.

40CFR 63-WWWW.5835
Section 63.5835 specifies that the facility must be in compliance at all times with the work practice standards in table 4 of subpart WWWW, as well as the organic HAP emission limits in tables 3, that the facility is meeting without the use of add-on controls. The facility must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to

the provisions in §63.6(e)(1)(i).

40CFR 63-WWWW.5895 (c)
Section 63.5895 (c) specifies that the facility must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the facility is meeting any organic HAP emission limit based on an organic HAP emission limit in tables 3 or 5 of subpart WWWW. The facility must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the facility is meeting any organic HAP content limits in table 7 of subpart WWWW if the facility is averaging organic HAP contents. Resin use records may be based on purchase records if the facility can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

40CFR 63-WWWW.5900
Compliance with organic HAP emission limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emission limit listed in table 3 or 5 of subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d). Compliance with the work practice standards in table 4 of subpart WWWW is demonstrated by performing the work practice required for the operation. The facility must report each deviation from each standard in §63.5805 that applies. The deviations must be reported according to the requirements in §63.5910. Except as provided in §63.5900(d), during periods of startup, shutdown, or malfunction, the facility must meet the organic HAP emission limits and work practice standards that apply to the facility.

40CFR 63-WWWW.5905
The facility must submit all of the notifications in table 13 of subpart WWWW that apply by the dates specified in table 13 of Subpart WWWW. The notifications are described in more detail in 40CFR63, Subpart A, referenced in table 13. If the facility changes any information submitted in any notification, the facility must submit the changes in writing to NYSDEC within 15 calendar days after the change.

40CFR 63-WWWW.5910 (a)
The facility shall submit all of the reports listed in table 14 of subpart WWWW which apply to the facility.

40CFR 63-WWWW.5910 (b)
Section 63.5910 (b) of Subpart WWWW decscribes the requirements for submission of reports under §63.10(a). The facility must submit each report by the date specified in table 14 and according to the schedule listed in this section.

40CFR 63-WWWW.5910 (c)
Section 63.5910(c) of Subpart WWWW lists the information that must be contained in the compliance report

40CFR 63-WWWW.5910 (d)
Section 63.5910(d) requires that for each deviation from an organic HAP emission limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where the facility is not using a CMS to comply with the organic HAP emissions limitations or work practice standards in subpart WWWW, the compliance report must contain the information in §63.5910(c)(1)-(4) and below. This includes periods of startup, shutdown, and malfunction.

1) The total operating time of each affected source during the reporting period.

2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

40CFR 63-WWWW.5910 (g)

Section 63.5910 (g) requires that each affected source that has obtained a title V operating permit pursuant to 40CFR70 or 71 must report all deviations as defined in subpart WWWW in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to table 14 of subpart WWWW along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitations (including any operating limit) or work practice requirement in subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the NYSDEC.

40CFR 63-WWWW.5915

Section 63.5915 requires the facility to keep a copy of each notification and report that the facility submitted to comply with subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the facility submitted, according to the requirements in §63.10(b)(2)(xiv); the records in §63.6(e)(3)(iii)-(v) related to startup, shutdown, and malfunction and records of performance tests, design, and performance evaluations as required in §63.10(b)(2). In addition, the facility must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in tables 3, 5, and 7 of subpart WWWW and a certified statement that the facility is in compliance with the work practice standards in table 4 of subpart WWWW that apply.

40CFR 63-WWWW.5920

The facility must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1) for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. the facility may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

40CFR 63-WWWW.5925

Table 15 of subpart WWWW shows which parts of the general provisions listed in subpart A of 40CFR63 apply to the facility.

6NYCRR 200 .3

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

6NYCRR 201-3.1 (a)

An owner and/or operator of any of the exempt or trivial activities listed in this Subpart is exempt from the requirement to obtain registration or state facility permit. This does not apply to local air pollution control agency requirements.

6NYCRR 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is 49 tons per year of volatile organic compounds (VOCs).

6NYCRR 212 .10
6NYCRR Part 212.10: Reasonably available control technology (RACT) for major facilities requires an owner or operator of a facility with an annual potential to emit volatile organic compounds (VOC) at or above the major source threshold to comply with the RACT requirements for VOCs specified in this section. A facility owner and/or operator may chose to limit the facility PTE to less than the applicability threshold for VOCs to avoid the control requirements of this regulation.

6NYCRR 212 .11 (a)
The owner and/or operator of this facility, if required by the department to conduct stack testing to demonstrate compliance with 6 NYCRR Part 212, must comply with notification requirements and conduct capture efficiency and/or stack testing using acceptable procedures pursuant to 6 NYCRR Part 202.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .5 (a)
This section establishes an emission rate when two or more control devices exit to the atmosphere through a single emission point.

6NYCRR 212 .6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 212 .9
This section of the regulation contains the descriptions and definitions of the environmental ratings system and the tables which set the emission standards for each rating.

6NYCRR 228
6NYCRR Part 228: Surface Coating Processes requires an owner or operator of a facility, containing a coating line described in Table 1 and/or Table 2, to comply with volatile organic compound emission control requirements if the facility's annual potential to emit volatile organic compounds (VOCs) meets or exceeds the applicability threshold. A facility owner and/or operator may chose to limit the facility PTE VOCs to less than the applicability threshold to avoid the control requirements of this regulation.

Compliance Certification
Summary of monitoring activities at UNICELL BODY COMPANY INC:

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

0-AMOLD	38	record keeping/maintenance procedures
0-AMOLD	39	record keeping/maintenance procedures
0-AMOLD	43	intermittent emission testing
0-AMOLD	44	intermittent emission testing
0-AMOLD	45	intermittent emission testing
0-AMOLD	46	intermittent emission testing
0-AMOLD	49	record keeping/maintenance procedures
0-AMOLD	50	record keeping/maintenance procedures
0-AMOLD	51	record keeping/maintenance procedures
0-AMOLD	52	record keeping/maintenance procedures
0-AMOLD	53	record keeping/maintenance procedures
0-AMOLD	57	record keeping/maintenance procedures
0-AMOLD	58	record keeping/maintenance procedures
0-AMOLD	62	record keeping/maintenance procedures
0-AMOLD	64	record keeping/maintenance procedures
0-AMOLD	65	record keeping/maintenance procedures
0-AMOLD	66	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	74	record keeping/maintenance procedures
FACILITY	29	intermittent emission testing
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	record keeping/maintenance procedures

Basis for Monitoring

This title V permit specifies special operating/monitoring conditions, recordkeeping and reporting required to verify compliance with the applicable requirements. The basis for monitoring for these requirements is as follows:

Condition 28

Applicable Federal Requirement 6NYCRR 201-7:

Unicell Body Company , Inc. has an annual potential to emit (PTE) volatile organic compounds (VOCs) that exceeds the 50 tons per year (tpy) applicability threshold specified under 6NYCRR Subpart 212.10 - "Reasonably available control technology for major facilities" and 6NYCRR Part 228 - "Surface Coating Processes" for sources listed in Section 228.1, Table 2. Unicell accepted limitations to restrict the amount of VOC's emitted from the facility to less than the 50 tpy to avoid the VOC control requirements set forth in Subpart 212.10 and Part 228. This condition summarizes special operating conditions to limit Unicell's PTE VOCs from sources throughout the facility to 49.0 tpy. Unicell is required to track the purchase and use of VOC containing materials on a monthly basis and calculate facility-wide VOC emissions to verify

compliance with the CAP. The annual rolling total, determined by summing the individual monthly VOC emissions during any consecutive 12-month period , must be compared to the limit of 49 tpy. If VOC emissions exceed this limit, Unicell will be considered in violation of their VOC RACT CAP. That exceedance must be reported to the Department within 30 days. If Unicell is unable to comply with the emissions CAP they will be subject to the requirements of 6NYCRR212.10 and 6NYCRR228. Annual reporting is required. Records must be maintained on-site for five years and be available for review by the Department or USEPA upon request.

Condition No. 29

Applicable Federal Requirement 6NYCRR 212.4(c):

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The spray booth, application equipment and control equipment must be utilized and maintained in accordance with manufacturer's specifications. Spray application must be carried out to minimize overspray and particulate emissions. Filters must cover the entire exhaust opening and must be changed to ensure maximum capture efficiency. To verify maintenance practices filter changes must be recorded in a log book and purchase orders/invoices must be kept and made readily available for review by representatives from the NYSDEC or USEPA upon request. Compliance testing must be conducted at the discretion of the Department.

Condition No 31 and 20

Applicable Federal Requirements 6NYCRR212.6(a) and 6NYCRR211.3:

Opacity is regulated under 6NYCRR212.6(a) and 6NYCRR211.3 to control the emission of particulates, which when respired can harm human health and can cause reduced visibility. An opacity determination is a surrogate method of determining compliance with the in-stack concentration limit. The EP 0MAIN and EP PAINT at Unicell are subject to 6NYCRR212.6(a) and 6NYCRR211.3, which limits the average opacity of the emissions during any six consecutive minutes to less than 20%. A daily check of visible emissions during coating operations is required to verify compliance with this rule. The observation of emissions greater than zero percent opacity will trigger an investigation to determine the cause, followed by corrective action. If visible emissions persist, a Method 9 opacity evaluation is required to determine whether the opacity limit has been exceeded. The facility is considered in violation of 6NYCRR212.6(a) if the opacity is determined to be greater than 20%. Observation records and Method 9 analyses must be maintained on-site for five years and be available for NYSDEC for review to determine compliance. In addition to semiannually, reporting is required any time a Method 9 analysis is conducted. Since the limits are equivalent, compliance with the opacity limit specified under 6NYCRR211.3, may be verified via the monitoring requirements specified under 6NYCRR212.6(a).

Condition No. 32

Applicable Federal Requirement 6NYCRR 212.9:

The processes at Unicell generate considerable emissions of styrene and methyl methacrylate (MMA) and smaller amounts of several other volatile organic compounds/hazardous air pollutants and the facility is located in a potential environmental justice area in close proximity to residents. To determine the impact that these contaminants have on the surrounding residents and environment, the emission rate potential (ERP) of styrene, methyl methacrylate and total volatile organic compounds for EP 0MAIN must be determined while operating processes contained in Emission Unit 0-AMOLD at maximum capacity. Unicell must use the results of the stack test to assess the potential impacts on public health and the environment associated with long-term and acute exposures to styrene and MMA via an ambient air quality impact analysis of these contaminants. The calculated annual and short-term impacts for each contaminant must be evaluated against its annual guideline concentration (AGC) and short-term ambient guideline concentration (SGC). Since the odor thresholds are very low for styrene and MMA and odor complaints from the neighboring residents have been a problem, odor

detection values must also be used to evaluate acceptable short-term impacts for these contaminants. If the results for styrene and MMA are acceptable, further analysis will not be required. Otherwise, the analysis must include the impact of other VOCs emitted.

Condition No 39:
Applicable Federal Requirement:40CFR 63, Subpart WWWW:

Unicell must verify compliance with 40CFR63, Subpart WWWW in accordance with the final MACT Compliance Plan. If Unicell chooses to change the compliance option specified in the Plan, a revised MACT Compliance Plan must be submitted to NYSDEC for review and approval prior to changing the compliance option. Unicell's MACT Compliance Plan is contained in Appendix B of the title V permit.

Condition No. 74:
Applicable State Requirement: 6NYCRR 211.2

To reduce the health and environmental impact of fugitive emissions on the neighboring residents, Unicell must operate the facility in accordance with their Operation and Monitoring (O&M) Plan for the Control of Fugitive Emissions at all times that open molding and other VOC emitting activities are conducted at the facility. Anytime a change is made to the O&M Plan, the modified plan must be submitted to NYSDEC for review and approval prior to changing procedures at the facility