



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

**Permit ID: 9-1402-00773/00006  
01/28/2015**

**Facility Identification Data**

Name: ENGINEERED COMPOSITES INC  
Address: 55 ROBERTS AVE  
BUFFALO, NY 14206

**Owner/Firm**

Name: ENGINEERED COMPOSITES INC  
Address: 55 ROBERTS RD  
BUFFALO, NY 14206, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
Name: DENISE C MATTHEWS  
Address: 270 MICHIGAN AVE  
BUFFALO, NY 14203-2915  
Phone: 7168517165

Division of Air Resources:  
Name: MARCIA E LADIANA  
Address: NYSDEC - REGION 9  
270 MICHIGAN AVE  
BUFFALO, NY 14203-2915  
Phone: 7168517130

Air Permitting Contact:  
Name: ROMAN BOLUBUSH  
Address: FIBRERIGHT MANUFACTURING CORP  
55 ROBERTS RD  
BUFFALO, NY 14206  
Phone: 7163620295

**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**

Business growth requires the addition of new emission sources and an increase in allowable emissions. The 9 tpy individual hazardous air pollutant (HAP) and 24 tpy total HAPs 12-month rolling emission limits will be removed. ECI will become a major source of HAPs subject to Title V permitting requirements, the requirements of 40CFR63 Subpart WWWW for the reinforced plastic composites operations and 40CFR63 Subpart PPPP for the new coating line and the existing packaging process. A



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

**Permit ID: 9-1402-00773/00006  
01/28/2015**

CAP 49.0 TPY will be placed on 12-month rolling total facility-wide emissions of volatile organic compounds (VOCs), keeping the facility a minor VOC source with regard to New Source Review and VOC RACT requirements. This project includes the addition of two mixers, two SMC presses, a manual open molding resin application process, an SMC maturation tank and a coating line.

**Attainment Status**

ENGINEERED COMPOSITES 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:**

Engineered Composites, Inc. produces fiberglass reinforced plastic parts (RFP) by closed molding processes, including liquid compression molding (LCM), molding using Sheet Molding Compound (SMC), resin transfer (vacuum infusion) molding, bulk molding compound (BMC) and glass mat thermoplastic composite (GMT). ECI also operates the manual open molding process and a coating line for manufactured RFP parts. Facility emissions consist of hazardous air pollutants (HAPs), volatile organic compounds (VOCs) and particulates from molding, SMC production, grinding, drilling, powder coating, coating, mixing, storage and adhesive application/packaging processes. These emissions are exhausted through twelve emission points, directly or indirectly through general ventilation stacks. Three emission points (G0001-G0003) associated with finish grinding operations control particulates with accordion paper filters. Particulates from grinding sources G0005 and G0006 are controlled with spun bond polyester cartridge filters. Particulates generated by powder coating, flash cutting of plastic parts and mixing of LCM molding compound are controlled with polyester filters at each LCM press. Each general ventilation stack is equipped with a polyester filter for particulates generated by activities associated with the SMC and RTM presses, the SMC production and the drilling process. The spray booth operated for coating process CTG is equipped with a high efficiency particulate filter to capture aerosols and particulates containing polymeric isocyanates and diisocyanates. VOC/HAP emissions from the facility are not controlled.



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

**Permit ID: 9-1402-00773/00006  
01/28/2015**

**Permit Structure and Description of Operations**

The Title V permit for ENGINEERED COMPOSITES 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.

ENGINEERED COMPOSITES INC is defined by the following emission unit(s):

Emission unit B00001 - This emission unit consists of all fiberglass reinforced plastic (FRP) part manufacturing processes and associated activities contained in Building B-001. The processes include, but are not limited to, sheet molding compound (SMC) production, closed compression molding using liquid compression molding (LCM), SMC, bulk molding compound (BMC), glass mat thermoplastic composite (GMT), resin transfer molding (RTM) using vacuum infusion, mixing of LCM, RTM and SMC compounds, open molding (manual), coating (manual and spray applied), cutting FRP, powder coating, finish grinding FRP, drilling FRP, spray application of adhesives and sealants, packaging of finished plastic parts, cleaning/ maintenance activities, storage, etc. Each LCM press is operated in a booth under negative pressure to capture volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the molding process and particulates from flash cutting and powder coating of molded plastic parts. Particulate emissions are controlled with polyester filters at each press. Emissions from all of the LCM presses are exhausted through one stack, Emission Point (EP) C0001. All of the LCM presses may also be used with BMC. Emissions from the SMC, RTM and sample press, SMC machine, mixing tanks, open molding, RTM panel grinding, storage, and the finishing/packaging line are fugitive and are exhausted through general ventilation stacks (EPs G0004, GV007 – GV013). The SMC presses and the sample press may also be used with BMC and GMT. The general ventilation exhaust stacks have polyester filters (Emission Source Controls GC004, GVC07-GVC13) in place to capture fugitive particulates. Particulates generated by grinding operations at ES G0001-G0003 are exhausted through EP G0001-G0003, which are equipped with accordion paper filters (GC001-GC003) to control emissions of particulates. Grinding sources ES G0005 and ES G0006 are each equipped with spun bond polyester cartridge filters (GC005 and GC006) to capture particulates (inside exhaust vented to the atmosphere through GV013). The spray paint booth used for coating operations, Process CTG, is equipped with a dedicated exhaust system with appropriate filters for particulate control. This system is ducted into EP GV012. Emissions of volatile compounds are uncontrolled. Building B-001 is used as a permanent total enclosure (PTE) in accordance with USEPA Reference Method 204 to minimize the release of fugitive emissions through doors, windows and other building apertures.



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

**Permit ID: 9-1402-00773/00006  
01/28/2015**

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

C0001, G0001, G0002, G0003, G0004, GV007, GV008, GV009, GV010, GV011, GV012, GV013

Process: CTG is located at Booth, Building B001 - This process consists of an air-dried coating line for composite parts produced onsite. Currently, 2-part coatings (basecoat (coating) and topcoat (hardener)) are applied. The topcoat is reduced with odorless mineral spirits (aliphatic hydrocarbon mix). The basecoat is not reduced. ECI may apply other coatings that meet applicable requirements and emission limits.

Coatings will initially be manually applied by roller, so there will be no particulate emissions. If coatings are spray applied using a High Volume Low Pressure spray gun or other NYSDEC accepted spray equipment, coating operations will be conducted in a booth fitted with a high efficiency filter. If any coatings contain polymeric isocyanates/diisocyanates, then the spray paint booth must be operated with a filter that is rated high efficiency for the capture of particulates/aerosols in the range of 2.5 um to 10 um in diameter.

Process: GRD is located at south end, Building B001 - This process is the finish grinding of fiberglass reinforced plastic parts manufactured by LCM and SMC compression molding (ES G0001, ES G0002, & ES G0003) and resin transfer molding (ES G0005 & ES G0006). Particulates generated by grinding operations are controlled by a 98.1% efficient cardboard filter at each emission point.

Process: MAT is located at South Middle, Building B001 - Maturation and storage of Sheet Molding Compound (SMC).

Process: MIX is located at Various Locations, Building B001 - This process consists of all mixing operations for the preparation of Liquid Compression Molding (LCM) compound, Resin Transfer Molding (RTM) compound and Sheet Molding Compound (SMC) used in the closed compression presses, closed RTM presses and the SMC machine, respectively. Liquid resin, dry filler, pigment and catalyst are placed into batch mixers (Emission Sources (ES) MT001-MT005, G004A and G004B) to prepare LCM compound. Resin is mixed with hardener in batch mixers (ES MT006, MT007 and MT011) to prepare RTM compound which is then pumped directly from the mixing tank into the RTM press. SMC resin paste is mixed in multiple steps in two ways. In Option A, three mix tanks (MT008, MT009, and MT010) are employed. Polystyrene beads are dissolved in styrene in MT008, the contents are then mixed with filler and resin in MT009, and those contents are then mixed with pigments and additives in MT010 to make resin paste, which is then fed to the SMC machine. Option A is bottlenecked by the capacity of MT010. Option B eliminates this bottleneck by feeding the contents of MT009 directly to a storage tank, bypassing MT010. Pigment and thickener are added to the MT009 material via a closed in-line (static) mixer at the machine. Option B has the highest potential to emit styrene and particulates.

Particulates from MT001-MT005 are captured initially by vent hoods at each mixer, which are tied to a common 83% efficient cartridge filter system, which vents inside the shop. Those emissions then flow to general ventilation exhaust stacks GV008 and GV009. Particulates generated during the mixing process at MT006, MT007 and MT011 are vented to the atmosphere through general ventilation exhaust stack GV012.

Particulates from MT008, MT009 and MT010 are vented to the atmosphere through emission point



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

**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

G0004. All of the general ventilation exhausts stacks and EP G0004 are equipped with 99.7% efficient polyester filters (Chemco N-Polyester Paint Arrestors) to control particulates.

Process: MNL is located at Mid, Building B001 - This process involves the manual application of RTM resin to the edges of RTM panels for bonding large parts during assembly. It is regulated as manual application of open molded resin under the Reinforced Plastics Composites MACT rule. Fugitive VOC/HAP emissions from this process are indirectly exhausted to the atmosphere through general ventilation at EP GV012. There are no PM emissions generated during the manual application of RTM resin.

Process: P01 is located at south middle, Building B001 - This process consists of closed compression molding operations using poured liquid compression molding (LCM) compound and fiberglass to manufacture reinforced plastic parts. LCM compound is manually transferred from the mixing tank to the mold in discrete amounts using open buckets. LCM Presses 4, 5 and 6 (Emission Source (ES) P0004, ES P0005 and ES P0006) can also be used with SMC. This process also includes making LCM parts with the sample press. All of the LCM presses may also be used to produce plastic parts with ready-to-use bulk molding compound (BMC) that is purchased from a vendor. Particulate emissions are controlled by a 99.7% efficient polyester filter (Chemco N-Polyester Paint Arrestors) at each press exhaust hood and at EP GV009.

Process: P02 is located at south middle, Building B001 - This process consists of closed compression molding operations using sheet molding compound (SMC), bulk molding compound (BMC) or glass mat thermoplastic (GMT) composite to manufacture reinforced plastic parts. The ready-to-use BMC and GMT are purchased from a vendor. SMC is either purchased from a vendor or manufactured onsite. Particulate and VOC/HAP emissions from this process are indirectly vented to the atmosphere through the facility's general ventilation exhaust stacks. Particulate emissions are controlled by a 99.7% efficient polyester filter at each general ventilation stack.

Process: PKG is located at east, Building B001 - This process consists of the finishing and packaging of manufactured plastic parts. Bulk palletized tiles are moved into the packaging area. A drilling fixture is used to form tile perimeter vent holes and parts are then moved to a table where glue is sprayed onto the perimeter flange. Plastic is applied and adhered to the glue forming a protective cover for shipping. Parts are moved to finished good cartons. Particulate and VOC/HAP emissions from the packaging area are indirectly vented to the atmosphere through general ventilation exhaust stack EP GV009. Process PKG also includes the use of small quantities of miscellaneous adhesives plantwide with particulate and VOC/HAP emissions indirectly vented to the atmosphere through various general ventilation exhaust stacks. Particulate emissions are controlled by a 99.7% efficient polyester filter at each general ventilation stack.

Process: RTM is located at Building B001 - This is a closed resin transfer molding process using vacuum shut. A vacuum is pulled on the mold cavity and then a resin + hardener mixture is pumped and pulled



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

**Permit ID: 9-1402-00773/00006  
01/28/2015**

directly into the mold through tubing. The part cures in the closed mold. The part is removed and the cycle is repeated. VOC/HAP emissions from this process are indirectly vented to the atmosphere through the facility's general ventilation exhaust stack at EP GV012. There are no particulate emissions generated during this process.

Process: SMC is located at south end, Building B001 - This process consists of the production of sheet molding compound (SMC) using an SMC machine. Prepared SMC paste mixture is fed into the machine doctor box (reservoir) and is spread onto a nylon film. Chopped glass fiber is deposited on the paste on the lower film. The top film with paste is inverted and rolled on top of the lower film to sandwich the glass fibers and paste. This sandwiched package is pulled through a compacting section of the machine. The compacted sheet is accumulated and placed into a container lined with a polyethylene bag. The bag is closed to prevent styrene evaporation during storage (maturation) before use in Process P02. Particulate emissions are controlled by a 99.7% efficient polyester filter at the general ventilation exhaust stack.

**Title V/Major Source Status**

ENGINEERED COMPOSITES INC is subject to Title V requirements. This determination is based on the following information:

Engineered Composites Inc. (ECI) will change their permit status from Air State Facility to Title V with the issuance of this permit. With the removal of the 9.90 tpy and 24.5 tpy CAPs on individual hazardous air pollutants (HAPs) and total HAPs, ECI is now a major source of HAPs. The Title V permit includes a 49.0 tpy CAP on facility-wide volatile organic compounds, which allows ECI to avoid the requirements of 6NYCRR212.10 Reasonably available control technology for major facilities and 6NYCRR Subpart 231-5: New Major Facilities And Modifications To Existing Non-Major Facilities In Nonattainment Areas, and Attainment Areas of the State within the Ozone Transport Region.

**Program Applicability**

The following chart summarizes the applicability of ENGINEERED COMPOSITES 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	YES
SIP	YES



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

**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

**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**

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

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
3089	PLASTICS PRODUCTS, NEC

**SCC Codes**

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

SCC Code	Description
3-08-007-01	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Plastics Machining: Drilling/Sanding/Sawing/etc.
3-08-007-04	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Adhesive Consumption
3-08-007-36	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS FIBERGLASS RESIN PRODUCTS - RESIN CLOSED MOLDING
3-08-007-99	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Other Not Classified
4-02-022-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PLASTIC PARTS Coating Operation

**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

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

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
000079-20-9	ACETIC ACID, METHYL ESTER		>= 2.5 tpy but < 10 tpy
021645-51-2	ALUMINUM HYDROXIDE		> 0 but < 2.5 tpy
000630-08-0	CARBON MONOXIDE		> 0 but < 2.5 tpy
002855-13-2	CYCLOHEXANEMETHANAMINE, 5-AMINO-1,3,3-TRIMETHYL		> 0 but < 2.5 tpy
054914-37-3	CYCLOHEXANEMETHANAMINE...		> 0 but < 2.5 tpy
000541-02-6	DECAMETHYLCYCLOPENTASILOXANE		> 0 but < 2.5 tpy
028182-81-2	DIISOCYANATE, 1-6-HEXAMETHYLENE		> 0 but < 2.5 tpy
034590-94-8	DIPROPYLENE GLYCOL METHYL ETHER		> 0 but < 2.5 tpy
000110-54-3	HEXANE		
072259-73-5	HEXANEDIOIC ACID, POLYMER AND 5-ISOCYANATO-1-(ISOCYANATOME)...		> 0 but < 2.5 tpy
004098-71-9	ISOPHORONE DIISOCYANATE		> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN		> 0 but < 2.5 tpy
068609-97-2	OXIRANE, MONO[C12-14 ALKOXY METHYL]		> 0 but < 2.5 tpy
000098-56-6	PARACHLOROBENZOTRIFLUORIDE		> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES	28816	
025068-38-6	PHENOXY RESIN		> 0 but < 2.5 tpy
0NY075-00-5	PM-10	28816	
001569-01-3	PROPOXY-2-PROPANOL, 1-C6H14O2		> 0 but < 2.5 tpy
000100-42-5	STYRENE		>= 10 tpy
013463-67-7	TITANIUM DIOXIDE		> 0 but < 2.5 tpy
000108-88-3	TOLUENE		> 0 but < 10 tpy
0NY100-00-0	TOTAL HAP		>= 10 tpy but < 25 tpy
0NY998-00-0	VOC	98000	

**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.

New York State Department of Environmental Conservation  
Permit Review Report



Permit ID: 9-1402-00773/00006  
01/28/2015

- (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.
- (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 - 6 NYCRR 201-1.10(b)**

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

**Item C: 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 D: 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 E: 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.



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

Permit ID: 9-1402-00773/00006  
01/28/2015

- Item F: 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 G: 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 H: 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 I: 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 J: Permit Shield - 6 NYCRR Part 201-6.4(g)**  
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:
- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
  - ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
  - iii. The applicable requirements of Title IV of the Act;
  - iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.
- Item K: 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:

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

- 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**

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



Permit ID: 9-1402-00773/00006  
 01/28/2015

**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	113	Powers and Duties of the Department with respect to air pollution control
B-00001	40CFR 63-A	42	Subpart A - General Provisions apply to all NESHAP affected sources
FACILITY	40CFR 63-PPPP	38	Plastic Parts and Products Surface Coating NESHAP
B-00001/-/CTG	40CFR 63-PPPP.4490 (a) (1)	76	Plastic Parts and Products Surface Coating - Emission Limits
B-00001/-/CTG	40CFR 63-PPPP.4500 (a) (1)	77	Plastic Parts & Products Surface Coating NESHAP - General requirements
B-00001/-/CTG	40CFR 63-PPPP.4500 (b)	78	Plastic Parts & Products Surface Coating NESHAP - Operation of affected source
B-00001/-/CTG	40CFR 63-PPPP.4510 (b)	79	Plastic Parts & Products Surface Coating NESHAP - Initial Notification
B-00001/-/CTG	40CFR 63-PPPP.4510 (c)	80	Plastic Parts & Products Surface Coating NESHAP - Notification of Compliance Status
B-00001/-/CTG	40CFR 63-PPPP.4520 (a)	81, 82, 83	Plastic Parts & Products NESHAP - Semiannual reporting

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

B-00001/-/CTG	40CFR 63-PPPP.4530 (a)	84	requirements Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
B-00001/-/CTG	40CFR 63-PPPP.4530 (b)	85	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
B-00001/-/CTG	40CFR 63-PPPP.4530 (c)	86, 87, 88	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
B-00001/-/CTG	40CFR 63-PPPP.4530 (d)	89	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
B-00001/-/CTG	40CFR 63-PPPP.4530 (e)	90	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
B-00001/-/CTG	40CFR 63-PPPP.4530 (f)	91	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
B-00001/-/CTG	40CFR 63-PPPP.4530 (g)	92	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
B-00001/-/CTG	40CFR 63-PPPP.4530 (h)	93	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
B-00001/-/CTG/CTG01	40CFR 63-PPPP.4531	97	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
B-00001/-/CTG/CTG01	40CFR 63-PPPP.4540	98	Plastic Parts and Products Surface Coating NESHAP - Compliant Coatings - Initial Compliance Demonstration
B-00001/-/CTG/CTG01	40CFR 63-PPPP.4541	99	Plastic Parts and Products Surface Coating NESHAP - Compliant Coatings - Initial Compliance Demonstration
B-00001/-/CTG/CTG01	40CFR 63-PPPP.4542	100	Plastic Parts and Products NESHAP - Demonstration of continuous compliance - compliant coatings
B-00001/-/CTG/CTG01	40CFR 63-PPPP.4550	101	Plastic Parts and Products NESHAP -

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



Permit ID: 9-1402-00773/00006  
 01/28/2015

B-00001/-/CTG	40CFR 63-PPPP.4551	94	Emission rate without add-on controls option Plastic Parts and Products NESHAP - Emission rate without add-on controls option
B-00001/-/CTG	40CFR 63-PPPP.4551 (h)	95	Plastic Parts & Products Surface Coating NESHAP - Initial Compliance for Emission Rate without add-on controls option
B-00001/-/CTG	40CFR 63-PPPP.4552	96	Plastic Parts & Products Surface Coating NESHAP - Emission Rate Without Add-on Controls - continuous compliance
FACILITY	40CFR 63-WWWW	39	Reinforced Plastic Composite Production
B-00001	40CFR 63-WWWW.5790	43	Reinforced Plastic Composites NESHAP - Affected Sources Within Facility
B-00001	40CFR 63-WWWW.5800	44	Reinforced Plastic Composites NESHAP - Compliance Dates
B-00001	40CFR 63-WWWW.5805	45, 46	Reinforced Plastic Composites NESHAP - Standards - Table 3 Emission Limits and Table 4 Work Practice Standards
B-00001	40CFR 63-WWWW.5810	47	Reinforced Plastic Composites NESHAP - Options For Meeting Open Molding and Centrifugal Casting Operations Standards
B-00001	40CFR 63-WWWW.5835	48	Reinforced Plastic Composites NESHAP - General Requirements
B-00001	40CFR 63-WWWW.5895 (c)	49	Reinforced Plastic Composites NESHAP - Continuous Compliance Demonstrations
B-00001	40CFR 63-WWWW.5895 (d)	50	Reinforced Plastic Composites NESHAP - Continuous Compliance Demonstrations
B-00001	40CFR 63-WWWW.5900	51, 52, 53, 54, 55	Reinforced Plastic Composites NESHAP - Continuous Compliance Demonstrations
B-00001	40CFR 63-WWWW.5905	56	Reinforced Plastic Composites NESHAP - Notifications
B-00001	40CFR 63-WWWW.5910 (a)	57	Reinforced Plastic Composites NESHAP - Reports
B-00001	40CFR 63-WWWW.5910 (b)	58	Reinforced Plastic Composites NESHAP -

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

B-00001	40CFR 63-WWWW.5910 (c)	59	Reports Reinforced Plastic Composites NESHAP - Reports
B-00001	40CFR 63-WWWW.5910 (d)	60	Reinforced Plastic Composites NESHAP - Reports
B-00001	40CFR 63-WWWW.5910 (f)	61	Reinforced Plastic Composites NESHAP - Reports
B-00001	40CFR 63-WWWW.5910 (g)	62	Reinforced Plastic Composites NESHAP - Reports
B-00001	40CFR 63-WWWW.5910 (i)	63	Reinforced Plastic Composites NESHAP - Reports
B-00001	40CFR 63-WWWW.5915	64, 65, 66	Reinforced Plastic Composites NESHAP - Recordkeeping
B-00001	40CFR 63-WWWW.5920	67	Reinforced Plastic Composites NESHAP - Record Retention
B-00001	40CFR 63-WWWW.5925	68	Reinforced Plastic Composites NESHAP - Subpart A General Provisions
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	114	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.1 (b)	115	Potential to emit from exempt and trivial activities
FACILITY	6NYCRR 201-3.1 (c)	116	Potential to emit from exempt and trivial activities
FACILITY	6NYCRR 201-3.1 (d)	117	Capping and exempt and trivial activities
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	21, 40, 41	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions -

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

FACILITY	6NYCRR 201-6.4 (a) (8)	16	Fees
FACILITY	6NYCRR 201-6.4 (c)	3	General Conditions -
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Right to Inspect
FACILITY	6NYCRR 201-6.4 (c) (3) (ii)	5	Recordkeeping and
FACILITY	6NYCRR 201-6.4 (d) (4)	22	Reporting of
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Monitoring
FACILITY	6NYCRR 201-6.4 (f)	23	Records of
FACILITY	6NYCRR 201-6.4 (f) (6)	17	Monitoring, Sampling
FACILITY	6NYCRR 201-7	24, 25	and Measurement
FACILITY	6NYCRR 202-1.1	18	Reporting
FACILITY	6NYCRR 202-2.1	7	Requirements -
FACILITY	6NYCRR 202-2.5	8	Deviations and
FACILITY	6NYCRR 211.1	26, 27, 28	Noncompliance
FACILITY	6NYCRR 212.10	25	Compliance Schedules
FACILITY	6NYCRR 212.4 (c)	29	- Progress Reports
FACILITY	6NYCRR 212.6 (a)	30	Compliance
FACILITY	6NYCRR 212.9	31	Certification
FACILITY	6NYCRR 212.9 (b)	32, 33	Operational
FACILITY	6NYCRR 215.2	9	Flexibility
B-00001/-/CTG	6NYCRR 228-1.1 (a) (3)	69	Off Permit Changes
B-00001/GV012/CTG	6NYCRR 228-1.3 (a)	112	Federally Enforceable
B-00001/-/CTG	6NYCRR 228-1.3 (b) (1)	70	Emissions Caps
B-00001/-/CTG	6NYCRR 228-1.3 (c)	71	Required emissions
B-00001/-/CTG	6NYCRR 228-1.3 (d)	72	tests.
B-00001/-/CTG	6NYCRR 228-1.3 (e)	73	Emission Statements -
			Applicability
			Emission Statements -
			record keeping
			requirements.
			General Prohibitions
			- air pollution
			prohibited
			NOx and VOC RACT
			required at major
			facilities
			General Process
			Emission Sources -
			emissions from new
			processes and/or
			modifications
			General Process
			Emission Sources -
			opacity of emissions
			limited
			Tables.
			General Process
			Emission Sources -
			tables
			Open Fires -
			Prohibitions
			Once in always in
			Surface Coating
			General Requirements-
			Opacity
			General Requirements
			- Record Keeping
			Surface Coating
			General Requirements-
			Prohibitions
			Surface Coating
			General Requirements-
			Handling, storage and
			disposal
			Surface Coating -
			General control



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

**Permit ID: 9-1402-00773/00006  
01/28/2015**

FACILITY	6NYCRR 228-1.3 (e) (2)	34	requirements (Class A & most B)
B-00001/-/CTG	6NYCRR 228-1.4 (b) (5)	74	Use of 55 gallons of non-compliant coating
FACILITY	6NYCRR 228-1.6 (a)	35	Miscellaneous Plastic Parts Coatings
B-00001/-/CTG	6NYCRR 228-1.6 (a)	75	Surface coating VOC analysis.
B-00001/C0001/CTG	6NYCRR 228-1.6 (c)	111	Surface coating VOC analysis.
B-00001/-/PKG	6NYCRR 228-2.4 (a)	102	Surface coating access for sampling
B-00001/-/PKG	6NYCRR 228-2.4 (b) (1)	103	VOC Content Limits
B-00001/-/PKG	6NYCRR 228-2.4 (b) (3)	104	Surface Preparation
B-00001/-/PKG	6NYCRR 228-2.4 (b) (4) (i)	105	Solvent Cleanup Solvent
B-00001/-/PKG	6NYCRR 228-2.4 (b) (4) (ii)	106	Cleanup of spray application equipment in an enclosed cleaning system
B-00001/-/PKG	6NYCRR 228-2.4 (b) (4) (ii)	107	Cleanup of spray application equipment - cleanup solvent VOC content limit
B-00001/-/PKG	6NYCRR 228-2.4 (d)	108	Cleanup of spray application equipment - cleanup solvent composite vapor pressure
B-00001/-/PKG	6NYCRR 228-2.5 (a)	109	Work Practices
B-00001/-/PKG	6NYCRR 228-2.5 (c)	110	Recordkeeping Requirements for 228-2.4 (a)
FACILITY	6NYCRR 228-2.7 (a)	36	Maintain Records for 5 years
FACILITY	6NYCRR 228-2.7 (b)	37	Container Labeling
FACILITY	6NYCRR 231-5	25	Container Labeling New Major Facilities and Mods to Existing Non-major Facilities in Nonattainment and Attainment Areas of the State in the OTR

**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



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

**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

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

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

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

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

6 NYCRR 201-6.4 (d) (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



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

**Permit ID: 9-1402-00773/00006  
01/28/2015**

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

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

**Facility Specific Requirements**

In addition to Title V, ENGINEERED COMPOSITES INC has been determined to be subject to the following regulations:

40 CFR 63.4490 (a) (1)

This regulation contains an annual limitation on emissions of organic hazardous air pollutants from general use coating affected sources.

40 CFR 63.4500 (a) (1)

This regulation states that a coating operation using the compliant material option or the emission rate without add-on controls option to comply with Subpart PPPP must be in compliance with the applicable emission limit at all times.

40 CFR 63.4500 (b)

This regulation requires that the facility owner or operator continuously operate and maintain the facility and all air pollution control equipment used to comply with Subpart PPPP in accordance with the provisions of 40 CFR 63.6(e)(1)(i).

40 CFR 63.4510 (b)

This regulation describes the initial notification requirements for facilities that are subject to Subpart PPPP.

40 CFR 63.4510 (c)

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

This regulation describes the notification of compliance status that must be submitted by the owner or operator of a facility subject to Subpart PPPP.

40 CFR 63.4520 (a)

This section describes the semiannual reporting requirements and content for facilities subject to Subpart PPPP.

40 CFR 63.4530 (a)

This section states that the facility owner or operator must maintain a copy of each report submitted pursuant to Subpart PPPP. The facility owner or operator must also maintain a copy of any supporting documentation developed for the report.

40 CFR 63.4530 (b)

This section states that the facility owner or operator shall maintain a current copy of any information provided by material suppliers or manufacturers used to determine the mass fraction of organic hazardous air pollutants and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating used at the facility.

40 CFR 63.4530 (c)

This section describes the records that the facility owner or operator must keep for each compliance period.

40 CFR 63.4530 (d)

This section states that the facility owner or operator must maintain a record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.

40 CFR 63.4530 (e)

This section states that the facility owner or operator must maintain a record of the mass fraction of organic hazardous air pollutants for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

40 CFR 63.4530 (f)

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

This section states that the facility owner or operator must maintain a record of the mass fraction of coating solids for each coating used during each compliance period.

40 CFR 63.4530 (g)

This section describes the records that the facility owner or operator must keep if the facility uses an allowance in Equation 1 of 40 CFR 63.4551 for organic hazardous air pollutants contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility as described in 40 CFR 63.4551(e)(4).

40 CFR 63.4530 (h)

This section requires that the facility owner or operator keep records of the date, time, and duration of each deviation from the requirements of Subpart PPPP.

40 CFR 63.4531

This section specifies the required format for records kept pursuant to Subpart PPPP. It also specifies how long a the facility owner or operator must retain records.

40 CFR 63.4540

This section describes the date by which the facility owner or operator must conduct the initial compliance demonstration required by Subpart PPPP.

40 CFR 63.4541

This section describes the methods the facility owner or operator must use to demonstrate initial compliance with the emission limits in Subpart PPPP.

40 CFR 63.4542

This section describes the methods the facility owner or operator must use to demonstrate continuous compliance with the emission limits in Subpart PPPP.

40 CFR 63.4550

This section specifies the date by which the facility owner or operator must conduct the initial compliance demonstration required by Subpart PPPP.

New York State Department of Environmental Conservation  
Permit Review Report



Permit ID: 9-1402-00773/00006  
01/28/2015

40 CFR 63.4551

This section describes the methods the facility owner or operator must use to demonstrate initial compliance with the emissions limitations in Subpart PPPP.

40 CFR 63.4551 (h)

This section states that the organic hazardous air pollutant emission rate for the initial compliance period calculated using Equation 3 of 40 CFR 63.4551 must be less than or equal to the applicable emission limit for each subcategory in 40 CFR 63.4490 or the predominant activity or facility-specific emission limit allowed in 40 CFR 63.4490(c). This section also specifies record keeping requirements for facilities using the emission rate without add-on controls compliance option.

40 CFR 63.4552

This section describes the methods the facility owner or operator must use to demonstrate continuous compliance with the emission limitations in Subpart PPPP using the emission rate without add-on controls option.

40 CFR 63.5790

This section describes the portions of a facility engaged in the production of reinforced plastic composites that are subject to the requirements of Subpart WWWW.

40 CFR 63.5800

This section describes the compliance dates for facilities subject to Subpart WWWW.

40 CFR 63.5805

This section describes the standards that the facility owner or operator must meet in order to demonstrate compliance with Subpart WWWW.

40 CFR 63.5810

This section describes the various compliance options for a facility that operates one or more open molding and centrifugal casting operations.

40 CFR 63.5835

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



Permit ID: 9-1402-00773/00006  
01/28/2015

This section contains several general requirements for facilities that are subject to the requirements of Subpart WWWW.

40 CFR 63.5895 (c)

This section states that the facility owner or operator must collect and keep records of resin and gel coat use, organic hazardous air pollutant content, and the operation where the resin is used.

40 CFR 63.5895 (d)

This section states that resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in 40 CFR 63.5810(a). The facility owner or operator is required to retain records of resin and gel coat organic hazardous air pollutant content, and to include the list of these resins and gel coats and identify their application methods in each semiannual compliance report.

40 CFR 63.5900

This section describes the methods the facility owner or operator must use to demonstrate continuous compliance with the standards in Subpart WWWW.

40 CFR 63.5905

This section describes the required notifications and the date by which the facility owner or operator must submit them.

40 CFR 63.5910 (a)

This section states that the facility owner or operator must submit each report that applies to the operations at the facility.

40 CFR 63.5910 (b)

This section describes the schedule the facility owner or operator must follow when submitting the reports required by Subpart WWWW.

40 CFR 63.5910 (c)

This section describes the required content of the compliance report required by Subpart

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



Permit ID: 9-1402-00773/00006  
01/28/2015

WWWW.

40 CFR 63.5910 (d)

This section describes the information that the facility owner or operator must include in the compliance report if there were any deviations from an organic hazardous air pollutant emissions limitation and/or work practice standard required by Subpart WWWW.

40 CFR 63.5910 (f)

This section states that the facility owner or operator must report if the facility's organic hazardous air pollutant emissions exceeded the 100 tons per year threshold if that exceedance would make the facility subject to 40 CFR 63.5805(a)(1) or (d).

40 CFR 63.5910 (g)

This section states that if a facility subject to Subpart WWWW has obtained a Title V facility permit the deviation information submitted as required by Subpart WWWW will satisfy the deviation reporting requirements of Title V (i.e. the facility need not report the same deviations twice) for deviations from the requirements of Subpart WWWW.

40 CFR 63.5910 (i)

This section states that the facility owner or operator must state in the compliance report if the facility has changed compliance options since the previous report.

40 CFR 63.5915

This section describes the record keeping requirements for facilities subject to the requirements of Subpart WWWW.

40 CFR 63.5920

This section describes the record retention requirements for facilities that are subject to Subpart WWWW.

40 CFR 63.5925

This section outlines which provisions of the National Emission Standards for Hazardous Air Pollutants (40 CFR 63 Subpart A) apply to facilities that are subject to Subpart



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

Permit ID: 9-1402-00773/00006  
01/28/2015

WWWW.

40 CFR Part 63, Subpart 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 40 CFR 63. 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 describe 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.

40 CFR Part 63, Subpart PPPP

This regulation contains various requirements designed to reduce hazardous air pollutant emissions from facilities conducting surface coating operations on plastic parts and products.

40 CFR Part 63, Subpart WWWW

This regulation contains emissions limitations and other requirements designed to control emissions of hazardous air pollutants from facilities in the reinforced plastics composite production industry.

6 NYCRR 201-3.1 (b)

Unless otherwise provided for in this Chapter, emissions from exempt and trivial activities must be included in potential to emit calculations when determining whether an emission source is subject to (1) title V facility permitting pursuant to Subpart 201-6 of this Part; and/or (2) new source review pursuant to Part 231 of this Title.

6 NYCRR 201-3.1 (c)

If the total potential to emit for all exempt and trivial activities at a facility exceeds, or causes the facility to exceed, the major facility threshold, as defined in Subpart 201-2 of this Part, the facility is both subject to the provisions of Subpart 201-6 of this Part and no longer considered exempt or trivial for permitting purposes.

6 NYCRR 201-3.1 (d)

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

If physical and/or operational restrictions are required to maintain the total potential to emit for one or more of the listed exempt and trivial activities below the title V applicability thresholds described in Subpart 201-6 of this Part, or new source review requirements described in Part 231 of this Title, the activity is no longer considered exempt or trivial for permitting purposes.

6 NYCRR 201-6.4 (f)

This section describes the operational flexibility protocol proposed by the facility. The 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 212.10

This section describes the Reasonably Available Control Technology requirements for emissions of oxides of nitrogen and/or volatile organic compounds from major facilities.

6 NYCRR 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.

6 NYCRR 212.6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 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.

6 NYCRR 212.9 (b)

This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

(Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

6 NYCRR 228-1.1 (a) (3)

This citation dictates that any coating line, which is or becomes subject to the requirements of this regulation, will remain subject to its requirements even if the reason they were subject later falls below the applicability threshold.

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 (c)

This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

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 and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.3 (e)

This regulation outlines the general control requirements for emissions of volatile organic compounds related to surface coating.

New York State Department of Environmental Conservation  
Permit Review Report



Permit ID: 9-1402-00773/00006  
01/28/2015

6 NYCRR 228-1.3 (e) (2)

This citation allows any facility to use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits required by the regulation.

6 NYCRR 228-1.4 (b) (5)

This regulation describes the emission limits for facilities operating a miscellaneous plastic parts coating line.

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 228-2.4 (a)

This citation contains the VOC content limits for adhesives and sealants.

6 NYCRR 228-2.4 (b) (1)

This regulation requires that the volatile organic compound content of a surface repair solvent be less than 70 grams per liter.

6 NYCRR 228-2.4 (b) (3)

This regulation requires that the composite vapor pressure of a cleanup solvent be less than 45 millimeters of mercury at 20 degrees celsius.

6 NYCRR 228-2.4 (b) (4) (i)

This regulation requires that the facility owner or operator perform the removal of a

New York State Department of Environmental Conservation  
Permit Review Report



Permit ID: 9-1402-00773/00006  
01/28/2015

commercial or industrial adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment in an enclosed cleaning system, or equivalent cleaning system as determined by the test method identified in Section 228-2.6(h).

6 NYCRR 228-2.4 (b) (4) (ii)

This regulation requires that the facility owner or operator perform the removal of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment using a solvent with a volatile organic compound content less than or equal to 70 grams of volatile organic compounds per liter of material.

6 NYCRR 228-2.4 (b) (4) (iii)

This regulation requires that if parts containing dried adhesive are soaked in a solvent, the composite vapor pressure of the solvent, excluding water and exempt compounds, must be less than or equal to 9.5 millimeters of mercury at 20 degrees celsius. Further, the parts and solvent must be kept in a closed container that remains closed except when adding parts to or removing parts from the container.

6 NYCRR 228-2.4 (d)

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

6 NYCRR 228-2.5 (a)

This regulation describes the record keeping requirements for facilities that are subject to a volatile organic compound limit in Section 228-2.4(a).

6 NYCRR 228-2.5 (c)

This regulation requires that the facility owner or operator maintain all records kept pursuant to Part 228-2 for at least five years, and that such records be made available to the Department upon request.

6 NYCRR 228-2.7 (a)

This regulation outlines the labeling requirements for manufacturers of commercial or industrial adhesives, sealants, adhesive primers or sealant primers.



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

**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

6 NYCRR 228-2.7 (b)

This regulation describes the method used to calculate the volatile organic compound content of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is 49.0 tons per year (tpy) of volatile organic compounds (VOC), based on a 12-month rolling total from all sources throughout the facility, including exempt and trivial activities and fugitive emissions.. Engineered Composites Inc. has chosen to accept this limit to avoid the requirements of 6NYCRR212.10 Reasonably available control technology for major facilities and 6NYCRR Subpart 231-5: New Major Facilities and Modifications to Existing Non-Major Facilities in Nonattainment Areas, and Attainment Areas of the State within the Ozone Transport Region.

6 NYCRR Subpart 231-5

This Subpart applies to new major facilities and modifications to existing non-major facilities in non-attainment areas and attainment areas of the State within the Ozone Transport Region (OTR).

**Compliance Certification**

**Summary of monitoring activities at ENGINEERED COMPOSITES INC:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
-----		
---		
FACILITY	38	record keeping/maintenance procedures
B-00001/-/CTG	76	record keeping/maintenance procedures
B-00001/-/CTG	79	record keeping/maintenance procedures
B-00001/-/CTG	80	record keeping/maintenance procedures
B-00001/-/CTG	81	record keeping/maintenance procedures
B-00001/-/CTG	82	record keeping/maintenance procedures
B-00001/-/CTG	83	record keeping/maintenance procedures
B-00001/-/CTG	84	record keeping/maintenance procedures
B-00001/-/CTG	85	record keeping/maintenance procedures
B-00001/-/CTG	86	record keeping/maintenance procedures
B-00001/-/CTG	87	record keeping/maintenance procedures

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



**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

B-00001/-/CTG	88	record keeping/maintenance procedures
B-00001/-/CTG	89	record keeping/maintenance procedures
B-00001/-/CTG	90	record keeping/maintenance procedures
B-00001/-/CTG	91	record keeping/maintenance procedures
B-00001/-/CTG	92	record keeping/maintenance procedures
B-00001/-/CTG	93	record keeping/maintenance procedures
B-00001/-/CTG/CTG01	98	record keeping/maintenance procedures
B-00001/-/CTG/CTG01	99	record keeping/maintenance procedures
B-00001/-/CTG/CTG01	100	record keeping/maintenance procedures
B-00001/-/CTG/CTG01	101	record keeping/maintenance procedures
B-00001/-/CTG	94	record keeping/maintenance procedures
B-00001/-/CTG	95	record keeping/maintenance procedures
B-00001/-/CTG	96	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
B-00001	45	intermittent emission testing
B-00001	46	intermittent emission testing
B-00001	48	record keeping/maintenance procedures
B-00001	49	record keeping/maintenance procedures
B-00001	50	record keeping/maintenance procedures
B-00001	55	record keeping/maintenance procedures
B-00001	56	record keeping/maintenance procedures
B-00001	60	record keeping/maintenance procedures
B-00001	64	record keeping/maintenance procedures
B-00001	65	record keeping/maintenance procedures
B-00001	66	record keeping/maintenance procedures
FACILITY	115	record keeping/maintenance procedures
FACILITY	116	record keeping/maintenance procedures
FACILITY	117	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters as surrogate
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	32	work practice involving specific operations
FACILITY	33	work practice involving specific operations
B-00001/GV012/CTG	112	monitoring of process or control device parameters as surrogate
B-00001/-/CTG	70	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
B-00001/-/CTG	74	work practice involving specific operations
FACILITY	35	record keeping/maintenance procedures
B-00001/-/CTG	75	record keeping/maintenance procedures
B-00001/-/PKG	102	work practice involving specific operations
B-00001/-/PKG	103	work practice involving specific operations
B-00001/-/PKG	104	work practice involving specific operations
B-00001/-/PKG	106	work practice involving specific operations
B-00001/-/PKG	107	work practice involving specific operations
B-00001/-/PKG	108	record keeping/maintenance procedures
B-00001/-/PKG	109	record keeping/maintenance procedures
B-00001/-/PKG	110	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures

-----  
 ----



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

**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

**Basis for Monitoring**

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

**Condition 5**

**Applicable Federal Requirement 6NYCRR 201-6.4(c) (3) (ii):**

The requirements specified in this condition reflect the requirements of 40CFR70 Operating Permit Program, Subpart 70.6 for title V facility permits. ECI must submit semi-annual reports, certified by a responsible official, identifying any deviations from the requirements specified in their title V permit. Reports for excess emissions of HAPs that continue for more than one hour and excess emissions of regulated air pollutants that continue for more than two hours, must be submitted within 24 and 48 hours, respectively. Semiannual reports must also include the results of emission testing conducted during the previous six months.

**Condition 6**

**Applicable Federal Requirement 6NYCRR 201-6.4(e):**

The requirements specified in this condition reflect the requirements of 40CFR70 Operating Permit Program, Subpart 70.6 for title V facility permits. In accordance with this requirement, ECI must submit an annual compliance certification report that lists each condition of the permit that is the basis for the certification, indicating compliance status, whether compliance was intermittent or continuous, the method used to determine compliance and any additional information required to verify compliance if necessary.

**Condition 7**

**Applicable Federal Requirement 6NYCRR 202-2.1:**

Each year, by April 15th, all title V facilities must submit an annual emission statement to the Department. As a title V facility, ECI must submit this report, which lists the pollutants with the quantity emitted during the previous calendar year.

**Condition 8**

**Applicable Federal Requirement 6 NYCRR 202-2.5:**

ECI must maintain records that support the annual emission statement, including calculations onsite for 5 years.

**Condition. 23**

**Applicable Federal Requirement 6 NYCRR 201-6.4 (f)**

ECI may make certain changes to the facility without submitting an application for a permit modification, if the changes are made in accordance with the Operational Flexibility (Op-Flex) Protocol/Plan specified in this condition. All changes conducted under OpFlex require prior NYSDEC notification, review and approval. A summary of changes must be maintained onsite and must be included in the next modification or renewal application, whichever comes first.

**Condition 24 and Condition 25**

**Applicable Federal Requirement 6 NYCRR 201-7**

Engineered Composites Inc. (ECI) is required to track the purchase and use of VOC containing materials on a monthly basis, to verify compliance with 49.0 tpy CAP on facility-wide VOC emissions, set to avoid the requirements of 6NYCRR212.10, Reasonably Available Control Technology (RACT) for Major Facilities and 6NYCRR Subpart 231-5: New Major Facilities And Modifications To Existing Non-Major Facilities In Nonattainment Areas, and Attainment Areas of the State within the Ozone Transport Region. Each month the purchase and usage records must be used to calculate monthly VOC emissions and the



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

**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

12-month rolling total VOCs. 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 49.0 tpy. If VOC emissions exceed this limit, ECI will be considered in violation of their VOC CAP. That exceedance must be reported to the Department within 30 days. If ECI is unable to comply with the emissions CAP they will be subject to the requirements of 6NYCRR212.10. An annual monitoring report is required. Records must be maintained on-site for five years and be available for review by the Department or USEPA upon request.

**Condition 27**

**Applicable Federal Requirement 6 NYCRR 211.1**

Engineered Composites Inc. (ECI) is located near a residential community who could be affected by offsite emissions of styrene. Based on NYSDEC's short-term and annual guideline concentrations, the maximum short-term and annual ambient concentrations of styrene in the neighborhood surrounding ECI, evaluated using US EPA AERMOD refined atmospheric dispersion model, were determined to be well below the concentrations that would cause acute and chronic health effects. These concentrations were also below the average odor threshold for styrene. If styrene odor caused by ECI becomes a problem, ECI must take measures to reduce styrene emissions and subsequently the ambient concentration of styrene in the neighborhood surrounding their facility.

**Condition 28**

**Applicable Federal Requirement 6 NYCRR 211.1**

Due to styrene's low odor threshold and high vapor density, fugitive emissions have been a nuisance and health concern to residents in the surrounding neighborhood. To minimize the release of fugitive emissions and generation of offsite odors, ECI must operate Building B-001 as a permanent total enclosure to capture fugitive styrene emissions in accordance with USEPA Method 204 -Criteria for and Verification of a Permanent or Temporary Total Enclosure and ECI's ECI Final Method 204 Operation and Monitoring Plan. Building B-0001 must be inspected daily to verify compliance with the operating requirements specified in the Final Method 204 O&M Plan. At least once during each shift when HAP emitting processes are operating, 1) the direction of the airflow through the active NDO(s) must be verified using streamers, smoke tubes, etc and 2) the door position established for the NDO to comply with Method 204 must be confirmed for the active NDO. These inspections must be recorded in a logbook, including the date, time, observer's name, and a brief description of observations, any problems and/corrective actions taken.

**Condition 29**

**Applicable Federal Requirement 6 NYCRR 212.4(c):**

ECI must operate their facility in accordance with the requirements specified in this condition to comply with the 0.050 gr/dscf particulate concentration limit specified in 6NYCRR212.4(c). To ensure compliance with this limit, ECI uses particulate filters on all emission points (direct and indirect). The facility shall conduct inspections of the particulate filters and maintain/replace filters in accordance with the manufacturer's specifications. Inspections/maintenance must be recorded in a logbook for each emission point. Records of inspections, observations and maintenance performed must be kept on-site for a minimum of 5 years.

**Condition 30**

**Applicable Federal Requirement 6 NYCRR 212.6(a):**

To verify compliance with the opacity limit specified under 6 NYCRR 212.6(a), ECI must conduct daily visual scans of the facility emission points. If any opacity is observed, ECI must determine the cause and rectify the problem. If visible emissions greater than 0% persist, ECI must conduct a Method 9 opacity test to determine if the opacity is 20% or greater, in violation of 6NYCRR212.6(a). Daily observations must be recorded in a permanently bound notebook, which must be kept on-site for at least 5 years for NYSDEC review.



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

**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

**Condition 31**

**Applicable Federal Requirement 6 NYCRR 212.9:**

Based on NYSDEC's review of styrene emissions from all sources at Engineered Composites, Inc. (ECI), styrene was assigned an environmental rating of "B", as defined in 6NYCRR212.9(a). If odors become a problem or new information becomes available that shows that styrene causes serious health effects, this environmental rating will be increase to "A" and ECI will be required to reduce emissions in accordance with Table 2 of 212.9(b).

**Condition 32**

**Applicable Federal Requirement 6 NYCRR 212.9(b):**

Whenever ECI spray applies a coating that contains diisocyanate and/or isocyanate monomers, they must assume 100 % of the monomer passes through the particulate filter to the outside atmosphere. Diisocyanates and isocyanates have been assigned an environmental rating of 'A' because their discharge may result in serious adverse short-term and/or chronic health effects on the general public and the environment. ECI must meet the requirements for degree of cleaning specified in 6 NYCRR 212.9(b), Table 2 for A-rated contaminants. The emission rate potentials (ERPs) and annual emissions of diisocyanate and/or isocyanate monomers must be estimated for the worst case scenario. Based on the ERPs determined, the contaminants may require either 99% degree of air cleaning for ERPs between 1-10 lb/hr or the degree of air cleaning specified by the Department for ERPs less than 1 lb/hr. If the ERPs are less than 1 lb/hr, the ambient concentration of these contaminants must be determined using accepted air quality models and the results compared to NYSDEC's current short-term and annual guideline concentrations (SGCs and AGCs) to determine the ambient concentrations of these contaminants. If the ambient concentrations exceed their respective SGC and/or AGC, ECI will be required to control emissions of diisocyanate monomers to a level that results in ambient concentrations that are less than the SGC and/or AGC, as applicable.

**Condition 33**

**Applicable Federal Requirement 6NYCRR 212.9(b):**

ECI is permitted to operate Emission Source CTG02, only if the spray application of coatings is conducted in a spray booth that is under negative pressure (verified by a pressure gauge) with a highly efficient particulate filtration system capable of capturing aerosols/particles generated during the coating process. Whenever Emission Source CTG02 is operated with coatings that contain polymeric diisocyanates and/or polymeric isocyanates a high efficiency filtration system capable of capturing particles with diameters between 2.5 um and 10 um must be used. This particulate control device is required to comply with the degree of cleaning specified under 6 NYCRR 212.9 (b) to minimize the adverse effects of exposure to fine polymeric diisocyanate and/or polymeric isocyanate aerosols and particulates. Any change in this filtration system must be reviewed and approved by NYSDEC prior to modification. Ambient concentrations of contaminants generated by this emission source must be determined using accepted air quality models, then evaluated against NYSDEC's current short-term and annual guideline concentrations (SGCs and AGCs). All records of coating purchases, coating usage, Material Safety Data Sheets, Technical/Product Data Sheets, manufacturer's specifications/guarantees/test results/performance data for spray application equipment, filters and spray booth and any other pertinent information used to verify compliance with this requirement must be maintained onsite and must be available for NYSDEC review upon request. To minimize the release of contaminants to the atmosphere, ECI must use and maintain the spray booth and associated equipment, the application equipment and control equipment in accordance with manufacturer's specifications and must fulfill the monitoring requirements specified in this condition.

**Condition 34**

**Applicable Federal Requirement 6NYCRR228-1.3(e) (2):**

ECI may use up to 55 gallons of noncompliant coating, facility wide on a 12-month rolling total basis if usage is monitored and records are kept onsite.



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

**Permit ID: 9-1402-00773/00006**  
**01/28/2015**

**Condition 35**

**Applicable Federal Requirement 6NYCRR228-1.6(a):**

ECI must test the VOC content of coatings used if the manufacturer/vendor fails to supply acceptable formulation data and certification.

**Condition 36**

**Applicable Federal Requirement 6NYCRR228-2-7(a):**

ECI may only purchase and use adhesive, sealant, adhesive primer, or sealant primer in containers that display the required information specified in this condition.

**Conditions 38, 76-101**

**Applicable Federal Requirement 40CFR63, Subpart PPPP:**

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for plastic parts and products surface coating facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations. ECI operates a coating operation for the surface coating of plastic parts as defined under 40CFR63.4481(a), which is subject to the applicable provisions of 40CFR 63 Subpart PPPP. ECI is responsible for complying with all applicable technical, administrative and reporting requirements specified in 40 CFR 63 Subpart PPPP. ECI chose to comply with Subpart PPPP requirements by meeting the limit of 0.16 lb HAP/lb coating solids, as applied, by either using compliant materials or calculating emission rate without controls (averaging across coatings). Vendor data will be used to perform calculations needed to demonstrate compliance, as specified in Subpart PPPP. ECI must conduct required work practices, including the use of cleanup solvents that do not contain HAPs and keeping coating and solvent containers covered when not in use. HAP-containing cleanup solvents will not be available for use on the coating line. ECI will prepare standard operating procedures that will specify proper material handling. Operator training and periodic inspections will ensure compliance with this rule. ECI must comply with all monitoring, recordkeeping and reporting requirements of Subpart PPPP.

**Conditions 39, 43-68**

**Applicable Federal Requirement 40CFR63, Subpart WWWW:**

This Subpart establishes national emissions standards for hazardous air pollutants (HAPs) and requirements to demonstrate initial and continuous compliance with these standards for reinforced plastic composites production at facilities that exceed the major source threshold for HAPs. Reinforced plastic composites production is limited to operations in which reinforced and/or non-reinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites. ECI owns and operates a reinforced plastic composites production facility, located at a major source of HAPs and is therefore subject to all applicable requirements of 40CFR63 Subpart WWWW. ECI is responsible for complying with all applicable technical, administrative and reporting requirements of 40CFR 63 Subpart WWWW for each affected source and associated activities. In accordance with 40CFR63, Subpart WWWW requirements, resin mixers use covers with no visible gaps except 1" around mixer shafts and instrumentation. Mixing vents are closed except during material transfer or as necessary for safety. Mixers remain covered except when adding material or changing covers. For SMC production, the resin delivery system to the doctor boxes are closed by design (boxes need not be covered) and use nylon-containing film to enclose the SMC. For Compression/Injection Molding (does not apply to RTM presses), ECI must uncover, unwrap, or expose only one charge per mold cycle per press. SMC may be uncovered to be slit, then must be recovered. For hopper-fed presses, one hopper full may be uncovered at a time. ECI will prepare standard operating procedures for charge preparation and will reinforce this in operator training and periodic inspections. ECI will not use HAP-containing cleanup solvents, except for cleaning cured resin. Styrene may be used for cleanup in closed systems only. HAP- containing solvents will not be available for use, so compliance is



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

**Permit ID: 9-1402-00773/00006  
01/28/2015**

assured. ECI will apply resin mix with no more than 123 lb HAP/ton of resin mix limit specified in rule Table 3 (equivalent to 40% styrene). Vendor data will be used to perform calculations needed to demonstrate compliance, as specified in rule. ECI must comply with all monitoring, recordkeeping and reporting requirements of Subpart WWWW.

**Conditions 69-75, 111, 112**

**Applicable Federal Requirement 6 NYCRR 228-1:**

VOC emissions from coating line for fiberglass parts shall not exceed 3.5 lb/gallon as applied. Vendor data will be used to perform calculations needed to demonstrate compliance. ECI must comply with reporting sampling and analysis, when requested.

**Conditions 37, 102-110**

**Applicable Federal Requirement 6 NYCRR 228-2:**

VOC emissions from adhesives used to bond fiberglass parts shall not exceed 200 grams/liter (1.67 lb/gallon), as applied. Vendor data will be used to perform calculations needed to demonstrate compliance. ECI must also comply with VOC and vapor pressure limits for surface preparation and cleanup solvents and work practice requirements specified in Part 228-2. All containers must be labelled in accordance with 228-2.7.