

Orangeburg Industrial – Air Quality & Noise Studies

Tax Parcel IDs: 74.07-1-36, 74.07-1-2, 74.07-1-33

Town of Orangetown, Rockland County, New York

Colliers Engineering & Design Project Number: 21003528A

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Prepared for:
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1. Air Quality Existing Conditions

a. Project Site & Immediate Vicinity

The Existing Project Site is improved with two (2) commercial buildings, parking lot, and access road/driveway and is situated in a mixed-use neighborhood. The Proposed Action involves the development of one (1) 175,750 square foot (SF) warehouse and associated parking lots located on Tax Parcels 74.07-1-2, 74.07-1-33, and 74.07-1-36 in the Town of Orangetown, Rockland County, New York. The Project Site is bounded by commercial properties and NYS Route 303 to the east, Mountain View Avenue to the south, a CSX rail line to the west, and a manufacturing facility to the north.

This report evaluates air quality by reviewing the effects of air emission sources generated by the Proposed Action and reviewing nearby emission sources (stationary and mobile) on the ambient environment.

b. Emission Sources

The New York State Department of Environmental Conservation (NYSDEC) regulated air facility databases indicated there are six (6) stationary emission sources within ½-mile radius of the Project Site. Prevailing wind is to the northeast around the Project Site and the identified facilities are not located west of the Project Site (refer to the below figure). It is noted that these facilities are not considered major sources of emissions (Title V). A summary and a figure of the listed sources are provided below:

- Air Facility Registration: Tiffany Cleaners, Inc. (NYSDEC #3-3924-00102/00003) located adjacent to the east of the Project Site. Dry cleaning facility using general exhaust ventilation system. There is one (1) emission point. Facility uses approximately 30 gallons per year of an alternative (synthetic) dry cleaning solvent (DF-2000; CAS 64742-48-9, synthetic hydrocarbon, ExxonMobil). A Freedom of Information Law (FOIL) request was submitted to the NYSDEC to obtain air emission modeling. As of the issuance date of this report, FOIL documentation has not been received back from the NYSDEC. If Colliers Engineering & Design receives relevant documents from the NYSDEC that reveals new and pertinent findings relative to the Project Site, a Letter of Addendum to this report will be submitted detailing the new findings.
- Air State Facility: Aluf Plastics Division (NYSDEC #3-394-00190), located 0.09 miles northwest of the Project site. Facility conducts plastic extrusion on site. The air permit was recently modified to include the installation of an improved facility ventilation system intended to reduce fugitive emissions from the plastic extrusion processes conducted on site. The facility will also increase the number of extrusion lines and storage silo emission sources as part of this application. The proposed ventilation system will increase the amount of make-up air supplied to the various rooms and process operations, which will eliminate smoke and haze from process rooms, increase operator comfort, allow all building doors to remain closed when not in use, and balance air flow between building rooms. This project also includes the installation of door alarms and implementation of other work practices intended to reduce excess fugitive emissions and odors from the facility. A Freedom of Information Law (FOIL) request was submitted to the NYSDEC to obtain air emission modeling. As of the issuance date of this report, FOIL documentation has not

been received back from the NYSDEC. If Colliers Engineering & Design receives relevant documents from the NYSDEC that reveals new and pertinent findings relative to the Project Site, a Letter of Addendum to this report will be submitted detailing the new findings.

- Air Facility Registration: Instrumentation Laboratory - Diagnostics (NYSDEC #3-3924-00017). Located adjacent to the north of the Project Site. The NYSDEC permit indicates that the facility is engaged in the preparation, quality assurance, testing, packaging and sale of in vitro diagnostic products and there are eleven (11) emission points. A Freedom of Information Law (FOIL) request was submitted to the NYSDEC to obtain air emission modeling. As of the issuance date of this report, FOIL documentation has not been received back from the NYSDEC. If Colliers Engineering & Design receives relevant documents from the NYSDEC that reveal new and pertinent findings relative to the Project Site, a Letter of Addendum to this report will be submitted detailing the new findings.
- Air Facility Registration: Praxair*MRC Surface Technologies (NYSDEC #3-3924-00027). Located 0.27 miles north of the Project Site. The NYSDEC permit indicates the facility manufactures and supplies high grade metal targets to semiconductor industries. There are a total of twenty-eight (28) emission points. Exempt sources include one generator (6 NYCRR 201-3.2(c)(6)) used for emergency back up and not on a coordinated demand program, as well as two 0.44 mmBTU/hr boilers (6 NYCRR 201-3.2(c)(1)). All run-on natural gas, therefore, the sources are not subject to 6 NYCRR Subpart 225 sulfur in fuel standards. A log shall be kept on site maintaining dates and run times for the generator to demonstrate compliance with the exempt status, for a period of five years. Praxair *MRC potential to emit (PTE) of regulated pollutants do not exceed the severe non-attainment area threshold emissions limits in Rockland County. Actual emissions are below 50% of the threshold limits. A Freedom of Information Law (FOIL) request was submitted to the NYSDEC to obtain air emission modeling. As of the issuance date of this report, FOIL documentation has not been received back from the NYSDEC. If Colliers Engineering & Design receives relevant documents from the NYSDEC that reveal new and pertinent findings relative to the Project Site, a Letter of Addendum to this report will be submitted detailing the new findings.
- Air State Facility: Nice-Pak Products (NYSDEC #3-3924-00093). Located 0.3 miles southeast of the Project Site. The NYSDEC permit indicates Nice-Pak Products produces moist towelettes for different uses. The facility's primary operations consist of mixing, filling, packaging, and cleaning. Emission sources include flexible packaging machines, aboveground and underground storage tanks, and batch mixing tanks. A renewal of the permit added eight (8) batch mixing tanks; three (3) are sized at 3,500 gallons, three (3) are sized at 750 gallons and two (2) are sized at 500 gallons. The two (2) 500-gallon tanks will be used to mix ethyl alcohol, water and batch ingredients containing VOCs. The remaining six (6) larger tanks will be used to mix specially denatured alcohol, water, glycol ethers and batch ingredients containing VOCs. All eight (8) tanks will be added under one (1) new emission unit, U-28, with one (1) single emission point, 00028. VOC potential to emit remains below 18 tons per year.
- Air Facility Registration: Gensinger Auto Body (NYSDEC #3-3924-00366). Located 0.40 miles south of the Project Site. The NYSDEC permit indicates the facility an auto body repair shop which operates a surface coating process. The facility uses HVLP spray guns and compliant coatings. Total number of emission points is one (1).

From a qualitative standpoint, it is worth mentioning the aforementioned CSX railroad that bounds the site immediately to the west. There are approximately 30 trains that pass the project site in a 24-hour period. Additionally, there are approximately 21,640 Annual Average Daily Traffic associated with NYS Route 303 which bounds the site to the east. The emissions associated with these consistent mobile sources far outweigh the anticipated emissions from those generated by the proposed action.

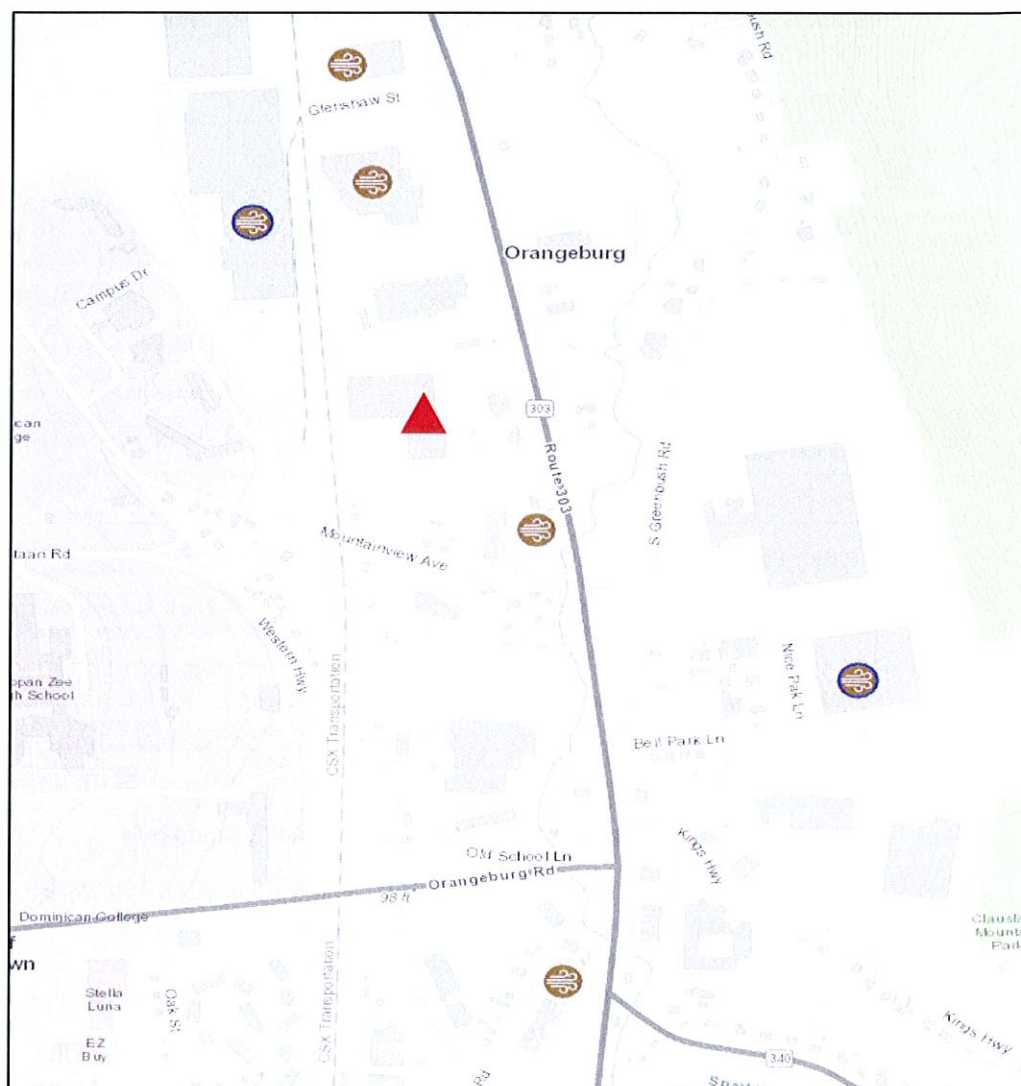


Figure 1: NYSDEC Air State Facilities and Air Facility Registrations

c. Environmental Protection Agency (EPA) Air Quality Data

The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of “sensitive” populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against

visibility impairment, damage to animals, crops, vegetation, and buildings. The Clean Air Act requires periodic review of the science upon which the standards are based and the standards themselves. The NAAQS has six (6) principal pollutants, which are called “criteria” pollutants, they include: Carbon Monoxide (CO), Lead (Pb), Nitrogen Dioxide (NO₂), Ozone (O₃), Particulate Pollution (PM_{2.5}), Particulate Pollution (PM₁₀) and Sulfur Dioxide (SO₂). Below are the National Ambient Air Quality Standards.

Pollutant	Standard Type	Averaging Time	Level	Unit	Form
Carbon Monoxide (CO)	primary	8 hours	9	ppm	Not to be exceeded more than once per year
Carbon Monoxide (CO)	primary	1 hour	35	ppm	Not to be exceeded more than once per year
Lead (Pb)	primary and secondary	Rolling 3-month	0.15	µg/m ³	Not to be exceeded
Nitrogen Dioxide (NO ₂)	primary	1 hour	100	ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
Nitrogen Dioxide (NO ₂)	primary and secondary	1 year	53	ppb	Annual Mean
Ozone (O ₃)	primary and secondary	8 hours	0.07	ppm	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particle Pollution PM _{2.5}	primary	1 year	12	µg/m ³	annual mean, averaged over 3 years
Particle Pollution PM _{2.5}	secondary	1 year	15	µg/m ³	annual mean, averaged over 3 years
Particle Pollution PM _{2.5}	primary and secondary	24 hours	35	µg/m ³	98th percentile, averaged over 3 years
Particle Pollution PM ₁₀	primary and secondary	24 hours	150	µg/m ³	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO ₂)	primary	1 hour	75	ppb	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
Sulfur Dioxide (SO ₂)	secondary	3 hours	0.5	ppm	Not to be exceeded more than once per year

Figure 2: National Ambient Air Quality Standards

According to the EPA Green Book, Rockland County, New York is listed as a Nonattainment County for 8-Hour Ozone (O₃) 215 Standard and 1-Hour Ozone (O₃) (1979). The EPA has designated Rockland County as a moderate non-attainment area for 8-Hour Ozone (1997) and Severe-15 for the 8-Hour Ozone (2008) and a State Implementation Plan (SIP) was implemented to attain the applicable National Ambient Air Quality Standard (NAAQS).

Rockland County	
8-Hour Ozone (2008)	New York-N. New Jersey-Long Island, NY-NJ-CT - (Severe 15)
8-Hour Ozone (2015)	New York-Northern New Jersey-Long Island, NY-NJ-CT - (Moderate)

Figure 3: Rockland County EPA Green Book

d. New York State Department of Environmental Conservation (NYSDEC) Ambient Air Monitoring Program

The NYSDEC measures air pollutants at more than 50 sites across New York State using continuous and/or manual instrumentation. These sites are a mix of federally mandated and supplemental monitoring networks. Real-time direct reading measurements include:

- Criteria pollutants (ozone (O₃), sulfur dioxide (SO₂), oxides of nitrogen (NO_x), carbon monoxide (CO)).
- PM 2.5 and PM10 (fine particulate)
- Black carbon
- Ultrafine particulate (UFP) count
- Meteorological data

The nearest air quality monitoring station to the Project site is located approximately 9 miles north on South Mountain Road in Rockland County. Data from Rockland County was available and indicated pollutants (1-bromopropane (BP), ozone and PM2.5) were below the applicable NAAQS. It is noted that the data may vary depending on factors such as temperature and weather patterns.

2. Future Conditions without Proposed Action

Without the Proposed Action, the Project Site would remain unoccupied with minimal activity occurring. Based on the Traffic Impact Study prepared by Dynamic and confirmed by the traffic consultant hired by the Planning Board, the level of service (LOS) for intersections near the Proposed Action indicates there will be a negative change to the LOS rating regardless of the project being built. The LOS ratings represented below are for the weekday morning and evening peak street hour for each intersection.

Table 1
AM Level of Service (LOS)
7:45 to 8:45 AM

Intersection #	Intersection	ETC (2023) No Build	ETC +10 (2033) No Build	ETC +20 (2043) No Build
1	Route 303 & Mountainview Avenue; signalized	D	E	F
2	Route 303 & Orangeburg Road (CR-20)/Driveway; signalized	C	C	C
3	Route 303 & Route 340/South Greenbush Road; signalized	B	C	C
4	Route 303 & Glenshaw Street; unsignalized	D	E	F

Table 2
PM Level of Service (LOS)
4:15 to 5:15 PM

Intersection #	Intersection	ETC (2023) No Build	ETC +10 (2033) No Build	ETC +20 (2043) No Build
1	Route 303 & Mountainview Avenue; signalized	F	F	F
2	Route 303 & Orangeburg Road (CR-20)/Driveway; signalized	D	D	E
3	Route 303 & Route 340/South Greenbush Road; signalized	C	D	E
4	Route 303 & Glenshaw Street; unsignalized	E	F	F

Air quality conditions on and adjacent to the Project Site are expected to remain to current conditions based on the data available at the Rockland County air quality monitoring station. Pollutants such as 1-bromopropane (BP), ozone and PM2.5 are below the applicable NAAQS thresholds.

3. Potential Impacts

Emission sources and potential short-term (Construction Phase) and long-term (Operational Phase) impacts resulting directly from the proposed project were evaluated during this study as part of the NYSDEC State Environmental Quality Review Act (SEQR) process. The project is presumed to be a Type 1 action.

Short-Term (Construction Phase)

Potential short-term and localized impacts identified during the SEQR review could occur during construction through the use of mobile sources like heavy equipment. Heavy equipment will be used during construction and could temporarily impact the air quality. Mobile air pollutants that may be present include carbon monoxide (CO), carbon dioxide (CO₂), hydrocarbons, nitrogen oxide (NO_x), sulfur oxides (SO₂) and particulate matter (PM). Other potential concerns of poor air quality may result from fugitive dust. Locations downwind of construction activities may be temporarily impacted. The prevailing wind direction is generally to the northeast in the vicinity of the project, which is the opposite direction from identified sensitive source receptors.

Although construction phase impacts are minimal the Client will take extra precautions through the use of Best Management Practices (BMP's) and since the project will have over an acre of disturbance, the client will have a State Pollutant Discharge Elimination System (SPDES) Permit. A few of the BMP's to be used include dust suppression, covering exposed topsoil piles to prevent erosion and stabilized construction entrances.

Construction vehicles are required to comply with 6 NYCRR Subpart 217.3 which prohibits heavy vehicles (including both diesel and non-diesel) from idling for more than five (5) minutes and Rockland County has a local law that is enforced restricting trucks from idling no more than three (3) minutes.

Although construction of the site could have potential short-term impacts to air quality the clean alternative fuels and new emission standards for heavy equipment published by the Environmental Protection Agency (EPA) on June 7, 2023; will greatly reduce short-term air quality impacts generated by the project. The new fuel requirements and integrating engine and fuel controls into heavy equipment has allowed for the greatest emission reductions by decreasing sulfur levels by more than 99%.

Long-Term (Operational Phase)

Potential Operational Phase and localized impacts identified during the SEQR review could occur during post-construction through the use of mobile sources like delivery vehicles.

Topics like Traffic and Air Emissions were evaluated to determine if the proposed project would have a negative effect on the overall air quality.

As part of the SEQR review Traffic and Transportation needs to be reviewed to determine if the proposed project is going to have an adverse impact to the area and if that impact will be significant. Based on the

SEQR guidance the projects Land Use is classified as *Light Industrial/Warehouse*, the threshold for this land use is 180,000 square feet (gross floor area). The proposed project is 175,760 square feet (gross floor area) which is less than the threshold identified above and therefore will generate less than 100 peak hour trips. According to the SEQR guidance, the proposed project falls below the threshold, and the project will not result in a substantial increase in traffic and a traffic capacity analysis is not required.

However, the Client did have a Traffic Impact Study prepared by Dynamic Traffic. The Town Highway Superintendent requested Conceptual Improvement Plans for the Mountain View Avenue / Route 303 Intersection. The proposed widening of Mountain View Ave as depicted on the Conceptual Improvement Plans was then incorporated into a Revised Traffic Impact Study by Dynamic Traffic. The revised study shows the proposed development, with mitigation, will result in no changes to the LOS whether the project is built or not. And in actuality, the mitigation will represent a slight improvement of the No-Build option at the Route 303 and Mountainview Avenue intersection. Table 3 and Table 4 show the difference in the LOS between the build and no build for ETC, ETC+10 and ETC+20.

Table 3 AM Level of Service (LOS) 7:45 to 8:45 AM				
Intersection #	Intersection	ETC (2023) No Build/Build	ETC +10 (2033) No Build/Build	ETC +20 (2043) No Build/Build
1	Route 303 & Mountainview Avenue; signalized	D/D	E/E	F/F
2	Route 303 & Orangeburg Road (CR-20)/Driveway; signalized	C/C	C/C	C/C
3	Route 303 & Route 340/South Greenbush Road; signalized	B/B	C/C	C/C
4	Route 303 & Glenshaw Street; unsignalized	D/D	E/E	F/F

Table 4 PM Level of Service (LOS) 4:15 to 5:15 PM				
Intersection #	Intersection	ETC (2023) No Build/Build	ETC +10 (2033) No Build/Build	ETC +20 (2043) No Build/Build
1	Route 303 & Mountainview Avenue; signalized	F/F	F/F	F/F
2	Route 303 & Orangeburg Road (CR-20)/Driveway; signalized	D/D	D/D	E/E
3	Route 303 & Route 340/South Greenbush Road; signalized	C/C	D/D	E/E
4	Route 303 & Glenshaw Street; unsignalized	E/E	F/F	F/F

Through the SEQR review, potential long-term mobile sources like delivery vehicles were evaluated post-construction. Of the listed emissions in the Environmental Assessment Form (EAF) Part 2, this site will potentially be emitting CO₂ from the trucks that will be traversing the site.

The following calculations were done to determine the amount of greenhouse gas emissions trucks on site will produce. The greenhouse gas emissions from trucks is calculated based on the distance the shipment is traveling (D) times the weight of the shipment (W) times the mode's specific emissions factor (EF). The Distance (D) the trucks travel when entering the site via Route 303 driveway, turning into a loading dock, and then leaving via the driveway onto Mountainview Road is approximately 1,800 feet, or 0.33 miles. The maximum legal weight (W) for a fully loaded tractor trailer is 80,000lbs, or 40 tons. Not

every truck entering or moving around the site will weigh this much, but the maximum was used to be conservative in our calculation. The average tractor trailer in the US emits (EF) 161.8 grams of CO₂ per ton-mile. Based on the Traffic Study prepared by Dynamic, the PM Peak hour will result in 3 trucks entering/exiting the site. That is the PEAK hour. Truck operations are only permitted between 7am and 11pm per the Town ordinance, which represents 16 hours. If we are conservative and assume 3 trucks per hour for the full 16 hours, over 365 days, the following CO₂ emissions in grams:

$$0.33 \text{ miles} \times 40 \text{ tons} \times 161.8 \text{ grams} \times 3 \text{ trucks per hour} \times 16 \text{ hours} \times 365 \text{ days} =$$

37,418,515 grams of CO₂ per year

To convert that to tons, simply divide by 1,000,000 which means on an extremely conservative basis, the trucks related to this site will contribute **less than 40 tons of CO₂ per year**. The EAF Part 2 lists the threshold for CO₂ at 1,000 tons per year. This site does not even contribute half of one-tenth of the threshold value.

The remaining emissions in the EAF Part 2 would only be relevant depending on tenant specific operations which are subject to NYSDEC Air Permits as well as Performance Standards Review by the Town Industrial Use Committee. Therefore, this would be considered no or a small impact.

The project is subject to all regulatory permits and laws such as truck idling that is enforced by NYSDEC. Rockland County also has a code which restricts idling to 3 minutes, which the project shall comply with as well. Similarly, on a local level, the project is subject to Performance Standards Review by the Town Industrial Use Committee (IUC). The project shall comply with all requirements but actual logistics and measures to be implemented would be tenant specific. Along those lines, the HVAC system is also subject to review by IUC but it is proposed to run off natural gas and is not subject to 5 NYCRR Subpart 255 sulfur in fuel standards (6 NYCRR 201.3.2(c)).

Since the traffic impacts are considered small, the existing roads have the capacity to handle the traffic projected from this project, and the calculated CO₂ emissions for the trucks post-construction falls below the threshold, no further air quality analysis needs to be completed.

4. Air Quality Conclusion

The Project Site is not anticipated to adversely impact background air quality conditions based on the SEQR review. The lack of long-term major emissions originating from site operations and review of traffic data classifies this project as having a small impact and no impacts to human health are anticipated. Based on surrounding facility information (classification as a non-major Title V facilities), it is unlikely that air pollution (above background levels) and associated odors will occur and affect the Project Site. The Project is subject to all regulatory permits and laws such as truck idling that is enforced by NYSDEC. Rockland County enforces a code which restricts truck idling to 3-minutes, which the project shall comply with. On a local level, the project is subject to Performance Standards Review by the Industrial Use Committee (IUC). This report will be revised should any of the above regulatory agencies request further air quality modeling.

5. Noise Study

Potential noise sources associated with the Project Site include traffic (e.g., truck traffic and idling), roof-mounted HVAC equipment, electrical service equipment and emergency generators for the warehouses. The warehouse will be used predominantly for storage with limited equipment testing and operations generating continuous loud noises. The Town of Orangetown Ordinance Section 22-1 for Noise states that the making, creation, or maintenance of such excessive, unnecessary, or unusually loud noises which are prolonged, unusual, and unnatural in their time, place and use affect and are a detriment to public health, comfort, convenience, safety, welfare, and prosperity of the residents of the Town of Orangetown.

Town of Orangetown Ordinance Section 22-3 states that between the hours of 7:00am and 11:00pm, any noise at a level or above 80 decibels (dB) at the point of alleged disturbance, which point must be at or beyond the property line of the property of the noise source, is prohibited. Additionally, between the hours of 11:00pm and 8:00am, any noise at a level or above 50 decibels (dB) at the point of alleged disturbance, which point must be at or beyond the property line of the property of the noise source, is prohibited. The applicant shall comply with the Town Ordinance. There will be no truck-related operations occurring between the hours of 11:00pm and 7:00am on-site, but there may be a tenant that performs operations internal to the building within those hours.

The anticipated noise sources from the project site are not anticipated to affect background nighttime noise levels in the vicinity of the Project Site, but may increase background noise levels during peak daytime operation. It is noted that background day-night average (DNL) noise levels are already in excess of HUD acceptable threshold of 65 decibels (dB) due to the presence of SR 303 and the adjoining railroad. Refer to the supplemental Housing and Urban Development (HUD) noise study below. Truck idling time will be enforced pursuant to 6 NYCRR Subpart 217-3 and local regulations. Generators will have air intake and exhaust silencers installed as per the manufacturers recommendations. Generators will also be regulated pursuant to all applicable federal, state, and local regulations.

In addition to the HUD Noise Study, calculations have been performed for the anticipated noise levels expected to be generated by the trucks on-site during the peak hour, as well as the proposed transformer. These calculations and contextualization can be found below.

HUD Noise Study

A study of existing background noise levels was conducted following HUD guidelines. The HUD noise calculator was used in determining day-night average sound level (DNL) from Aircraft, Roadways, and Railways with respect the Project Site. The noise level was measured in decibels (dB) and compared to the HUD acceptable threshold of 65 dB. Military and Civil Airports within 15 miles of the Project Site, all major roadways (10,000 vehicles or greater per day) within 1,000 feet of the Project Site, and all railways within 3,000 feet of the Project Site were evaluated in the noise calculation as discussed below.

Railroads

There is one (1) railroad within 3,000 feet of the Project Site. The railroad adjoins the Project Site parcel to the west (approximately 75 feet). The United States Department of Transportation Crossing Inventory Report indicates that the railroad is owned by CSX Transportation (CSXT) and only includes freight (no passenger trains). 30 trains are recorded daily on this railroad; 14 trains between 6 AM – 6 PM and 16 trains between 6 PM – 6 AM. This railroad was included in the noise study. Refer to the below image and attached documentation.



Airports

There is one civilian (1) airport (Westchester County Airport) within 15 miles of the project site; therefore, airports were included in the noise analysis. There are no known military airports within 15 miles of the project site. The noise contour for Westchester County Airport was reviewed and it was determined that the Project Site is located outside of the 65 dB level and therefore not included in the HUD calculation per HUD guidance.

Roads

HUD defines a major road as having 10,000 or more cars per day. Roadway noise is included only if a major road is within 1,000 feet of the Project Site. According to New York State Department of Transportation (NYSDOT) 2019 traffic data, Mountainview Avenue has an Annual Average Daily Traffic (AADT) of 5,324 (3% trucks) and therefore is not considered a major road and is not included in the noise calculation. SR-303 adjoins the Project Site to the east and has an AADT of 21,640 with a truck percentage of 5%. SR-303 was included in the noise study. The average speed of SR-303 in the vicinity of the Project Site is 36 mph. Individual vehicle class data were not available for the section of SR-303 adjoining the Project Site. Therefore, data from SR-303 south of Mountainview Avenue was used in the noise calculator. Refer to the below image and attachments.



Using the HUD noise calculator, the Day-Night Average Sound Level (DNL) at the project site from roads and railroads is estimated at 78 dB. This level exceeds the HUD noise acceptability threshold of 65 dB. The existing elevated levels of background noise in the community is a key factor to consider when evaluating the noise levels expected to be generated by the on-site activities.

On-site Noise Generation

There are two (2) known sensitive receptors near the project site, the closest of which is Dominican College Campus, and slightly further is Tappan Zee High School. Hertal Hall dormitory on the Dominican College campus is located approximately 470 feet from the proposed warehouse building. The baseball/softball field located at Tappan Zee High School is approximately 930 feet from the proposed warehouse building. It is also worth noting that the proposed warehouse building was designed so that the truck loading docks are facing east, towards Route 303 and the Commercial Properties. The XXX' wide building separates these sensitive receptors from the loading docks as well, further mitigating the possibility for noise to impact them. Also, as noted earlier, the CSX railroad lies between the proposed building and these sensitive receptors as well.

Along those, line-of-sight is helpful in evaluating where noise impacts can be potentially felt by sensitive receptors. The previously provided Line-of-Sight Exhibit for the rooftop HVAC equipment demonstrates that at the nearest point on the ground, the RTU is completely screened from view behind the parapet for the proposed building, thereby also obstructing any direct path of noise to the receptors. Additionally, the spec for the actual RTU is subject to Performance Standards Review by the Town IUC and must comply with the Town Ordinance.

Given the unlikely potential for impact at the educational facilities to the west due to distance and separation by the proposed building and existing commercial railroad, the only remaining potential impact locations would be the two residential buildings located on Mountain View Avenue, just south of the proposed building. While both do not have a straight-on line-of-sight, they are situated about 90 degrees from the Proposed Loading Docks. It is worth noting that the prior use of the property was not taken into account in the Traffic Impact Study and there were certainly traffic volumes and noise associated with it that would impact these same residential neighbors.

As mentioned earlier, please see calculations from the anticipated on-site noises in the appendix. For context, these calculations assumed a very conservative peak hour volume of 10 trucks and a 1000 kV Transformer. These calculations are conservative in that they do not account for the following:

- Peak hour volume for trucks of Land Use 150 is only 3 trucks per hour
- Distribution of trucks across the entire loading area (the 10 nearest loading bays were used for calculations)
- Source/receiver elevations
- Absorption of sound by the air
- Absorption of sound by the ground
- Reduction of sound due to intervening structures, vehicles, equipment, and topography
- Directivity (change in level with direction) of noise sources such as backup alarms

As can be seen in the appendix, the conservative calculations indicate that the noise levels during the peak hour would exceed the maximum set by the Town Ordinance, by about 11 dB. The most impactful source of noise would be the trucks entering/exiting the driveway on Mountain View Avenue due to its proximity to the residences. However, that proposed driveway is in almost an identical location and distance from the existing residences. This is the only access point for the existing property so all traffic associated with the prior use, which included truck deliveries would use this driveway both coming and going. The proposed warehouse has a dedicated right-in/-right-out driveway onto Route 303 to reduce the amount of traffic that would need to use the driveway on Mountain View Avenue. It is worth pointing out, that this is the only individual noise source that exceed the 80dB threshold set by the Town Ordinance. The rest are all below that threshold. Additionally, as mentioned above, the peak hour number of trucks is extremely conservative in this analysis. Acknowledging there

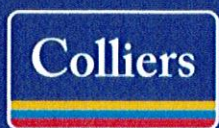
would still be an anticipated noise level above the Town Ordinance threshold at the property line for the residences, mitigation of some kind (i.e., a sound barrier) would be warranted at this location.

During construction, blasting is not anticipated as evidenced by the lack of bedrock encountered in the various test borings done as part of the geotechnical investigation. So while typical construction noise would be anticipated, those activities would not be considered an impact under SEQRA.

In conclusion, during construction there are no anticipated noise impacts for the proposed project, and during operation, with the installation of a sound barrier, the noise can be mitigated for the residential homes that are unfortunately situated in an Industrial (LI) zone and adjacent to a Commercial (CC) zone. The applicant proposes to perform a 3D model to optimize the design of the sound barrier, subject to review by the Town of Orangetown and their consultant, prior to final approval.

6. Conclusion

As outlined above, the proposed project is anticipated to have no adverse environmental impact on the surrounding area with respect to Air Quality or Noise.



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FEDERAL RAILROAD ADMINISTRATION

OMB No. 2130-0017

Instructions for the initial reporting of the following types of new or previously unreported crossings: For public highway-rail grade crossings, complete the entire inventory Form. For private highway-rail grade crossings, complete the Header, Parts I and II, and the Submission Information section. For public pathway grade crossings (including pedestrian station grade crossings), complete the Header, Parts I and II, and the Submission Information section. For Private pathway grade crossings, complete the Header, Parts I and II, and the Submission Information section. For grade-separated highway-rail or pathway crossings (including pedestrian station crossings), complete the Header, Part I, and the Submission Information section. For changes to existing data, complete the Header, Part I Items 1-3, and the Submission Information section, in addition to the updated data fields. Note: For private crossings only, Part I Item 20 and Part III Item 2.K. are required unless otherwise noted. An asterisk * denotes an optional field.

A. Revision Date (MM/DD/YYYY) 07 / 10 / 2014	B. Reporting Agency <input checked="" type="checkbox"/> Railroad <input type="checkbox"/> Transit <input type="checkbox"/> State <input type="checkbox"/> Other	C. Reason for Update (Select only one) <input checked="" type="checkbox"/> Change in Data <input type="checkbox"/> New Crossing <input type="checkbox"/> Closed <input type="checkbox"/> Re-Open <input type="checkbox"/> Date Change Only <input type="checkbox"/> Change in Primary Operating RR <input type="checkbox"/> No Train Traffic <input type="checkbox"/> Quiet Zone Update <input type="checkbox"/> Admin. Correction	D. DOT Crossing Inventory Number 507073P
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Part I: Location and Classification Information

1. Primary Operating Railroad CSX Transportation [CSX]		2. State NEW YORK		3. County ROCKLAND	
4. City / Municipality <input type="checkbox"/> In <input checked="" type="checkbox"/> Near ORANGEBURG		5. Street/Road Name & Block Number MOUNTAIN VIEW AVE (Street/Road Name) * (Block Number)		6. Highway Type & No. L	
7. Do Other Railroads Operate a Separate Track at Crossing? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Specify RR			8. Do Other Railroads Operate Over Your Track at Crossing? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Specify RR		
9. Railroad Division or Region <input type="checkbox"/> None ALBANY		10. Railroad Subdivision or District <input type="checkbox"/> None RIVER		11. Branch or Line Name <input type="checkbox"/> None	
12. RR Milepost 0021.09 (prefix) (nnnn.nnn) (suffix)		13. Line Segment * QR		14. Nearest RR Timetable Station * ORANGEBURG	
15. Parent RR (if applicable) <input type="checkbox"/> N/A		16. Crossing Owner (if applicable) <input type="checkbox"/> N/A CSX		17. Crossing Type <input checked="" type="checkbox"/> Public <input type="checkbox"/> Private	
18. Crossing Purpose <input checked="" type="checkbox"/> Highway <input type="checkbox"/> Pathway, Ped. <input type="checkbox"/> Station, Ped.		19. Crossing Position <input type="checkbox"/> At Grade <input checked="" type="checkbox"/> RR Under <input type="checkbox"/> RR Over		20. Public Access (if Private Crossing) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
21. Type of Train <input type="checkbox"/> Freight <input type="checkbox"/> Transit <input type="checkbox"/> Intercity Passenger <input type="checkbox"/> Shared Use Transit <input type="checkbox"/> Commuter <input type="checkbox"/> Tourist/Other		22. Average Passenger Train Count Per Day <input type="checkbox"/> Less Than One Per Day <input type="checkbox"/> Number Per Day 0		23. Type of Land Use <input type="checkbox"/> Open Space <input type="checkbox"/> Farm <input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input checked="" type="checkbox"/> Institutional <input type="checkbox"/> Recreational <input type="checkbox"/> RR Yard	
24. Is there an Adjacent Crossing with a Separate Number? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Provide Crossing Number		25. Quiet Zone (FRA provided) <input checked="" type="checkbox"/> No <input type="checkbox"/> 24 Hr <input type="checkbox"/> Partial <input type="checkbox"/> Chicago Excused Date Established			
26. HSR Corridor ID <input type="checkbox"/> N/A		27. Latitude in decimal degrees (WGS84 std: nn.nnnnnnn) 41.0511863		28. Longitude in decimal degrees (WGS84 std: -nnn.nnnnnnn) -73.9493880	
29. Lat/Long Source <input checked="" type="checkbox"/> Actual <input type="checkbox"/> Estimated		30.A. Railroad Use *		31.A. State Use *	
30.B. Railroad Use *		31.B. State Use *		31.C. State Use *	
30.C. Railroad Use *		31.D. State Use *		32.A. Narrative (Railroad Use) *	
32.B. Narrative (State Use) *		33. Emergency Notification Telephone No. (posted) 800-232-0144		34. Railroad Contact (Telephone No.)	
35. State Contact (Telephone No.) 518-457-5521					

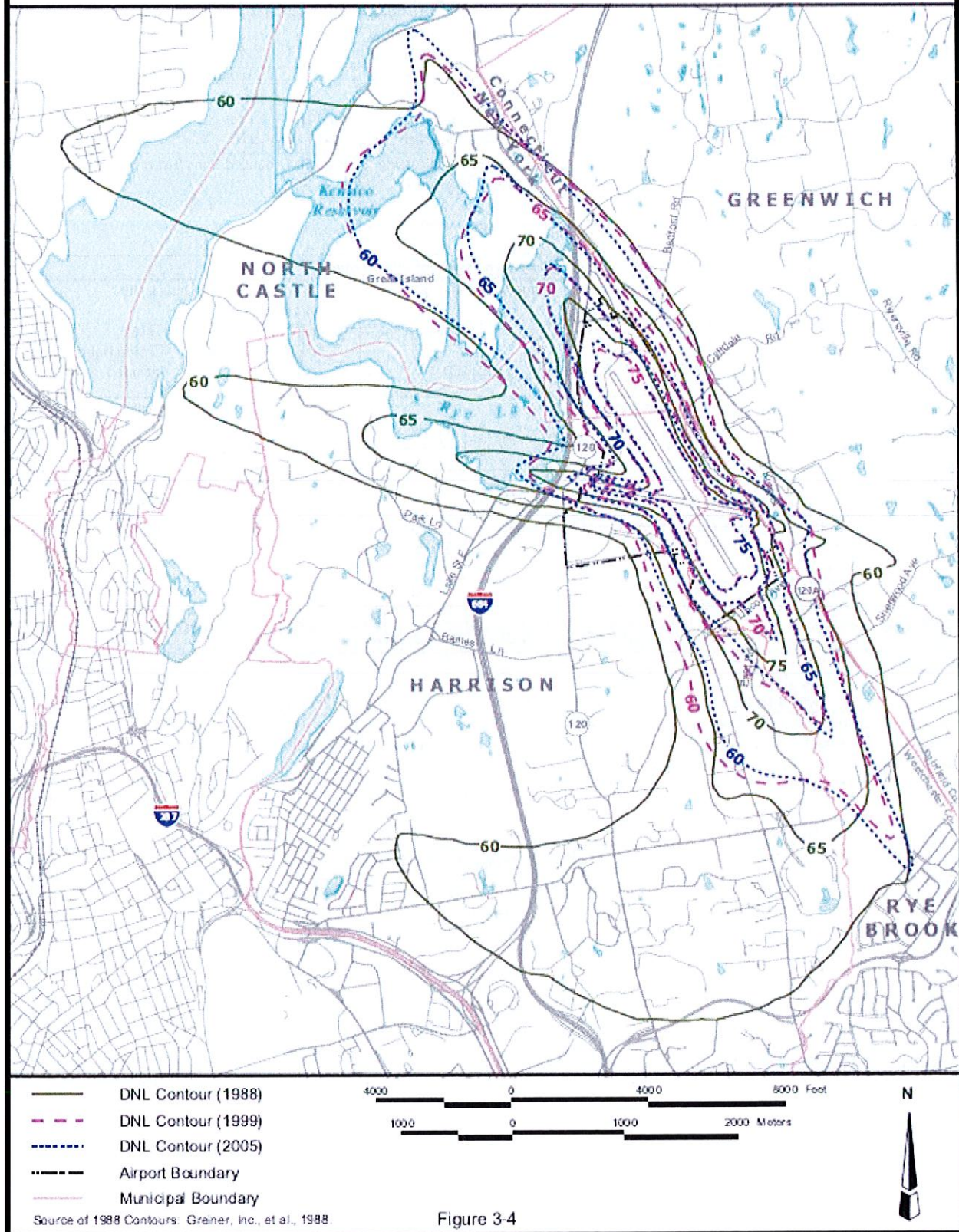
Part II: Railroad Information

1. Estimated Number of Daily Train Movements				
1.A. Total Day Thru Trains (6 AM to 6 PM) 14	1.B. Total Night Thru Trains (6 PM to 6 AM) 16	1.C. Total Switching Trains 0	1.D. Total Transit Trains	1.E. Check if Less Than One Movement Per Day How many trains per week? <input type="checkbox"/>
2. Year of Train Count Data (YYYY)		3. Speed of Train at Crossing 3.A. Maximum Timetable Speed (mph) 50 3.B. Typical Speed Range Over Crossing (mph) From 45 to 50		
4. Type and Count of Tracks Main 0 Siding Yard Transit Industry				
5. Train Detection (Main Track only) <input type="checkbox"/> Constant Warning Time <input type="checkbox"/> Motion Detection <input type="checkbox"/> AFO <input type="checkbox"/> PTC <input type="checkbox"/> DC <input type="checkbox"/> Other <input checked="" type="checkbox"/> None				
6. Is Track Signaled? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		7.A. Event Recorder <input type="checkbox"/> Yes <input type="checkbox"/> No		7.B. Remote Health Monitoring <input type="checkbox"/> Yes <input type="checkbox"/> No

U. S. DOT CROSSING INVENTORY FORM

A. Revision Date (MM/DD/YYYY) 07/10/2014		PAGE 2		D. Crossing Inventory Number (7 char.) 507073P	
Part III: Highway or Pathway Traffic Control Device Information					
1. Are there Signs or Signals? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Types of Passive Traffic Control Devices associated with the Crossing			
2.A. Crossbuck Assemblies (count) 0		2.B. STOP Signs (R1-1) (count) 0	2.C. YIELD Signs (R1-2) (count)	2.D. Advance Warning Signs (Check all that apply; include count) <input checked="" type="checkbox"/> None <input type="checkbox"/> W10-1 <input type="checkbox"/> W10-3 <input type="checkbox"/> W10-11 <input type="checkbox"/> W10-2 <input type="checkbox"/> W10-4 <input type="checkbox"/> W10-12	
2.E. Low Ground Clearance Sign (W10-5) <input type="checkbox"/> Yes (count _____) <input type="checkbox"/> No		2.F. Pavement Markings <input type="checkbox"/> Stop Lines <input type="checkbox"/> Dynamic Envelope <input type="checkbox"/> RR Xing Symbols <input checked="" type="checkbox"/> None		2.G. Channelization Devices/Medians <input type="checkbox"/> All Approaches <input type="checkbox"/> Median <input type="checkbox"/> One Approach <input type="checkbox"/> None	2.H. EXEMPT Sign (R15-3) <input type="checkbox"/> Yes <input type="checkbox"/> No
2.J. Other MUTCD Signs Specify Type _____ Count _____ Specify Type _____ Count _____ Specify Type _____ Count _____		2.K. Private Crossing Signs (if private) <input type="checkbox"/> Yes <input type="checkbox"/> No	2.L. LED Enhanced Signs (List types)		
3. Types of Train Activated Warning Devices at the Grade Crossing (specify count of each device for all that apply)					
3.A. Gate Arms (count) Roadway 0 Pedestrian _____	3.B. Gate Configuration <input type="checkbox"/> 2 Quad <input type="checkbox"/> Full (Barrier) Resistance <input type="checkbox"/> 3 Quad <input type="checkbox"/> Median Gates <input type="checkbox"/> 4 Quad	3.C. Cantilevered (or Bridged) Flashing Light Structures (count) Over Traffic Lane 0 <input type="checkbox"/> Incandescent Not Over Traffic Lane 0 <input type="checkbox"/> LED		3.D. Mast Mounted Flashing Lights (count of masts) 0 <input type="checkbox"/> Incandescent <input type="checkbox"/> LED <input type="checkbox"/> Back Lights Included <input type="checkbox"/> Side Lights Included	3.E. Total Count of Flashing Light Pairs 0
3.F. Installation Date of Current Active Warning Devices: (MM/YYYY) _____/_____/_____ <input type="checkbox"/> Not Required		3.G. Wayside Horn <input type="checkbox"/> Yes Installed on (MM/YYYY) ____/____/_____ <input type="checkbox"/> No		3.H. Highway Traffic Signals Controlling Crossing <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	3.I. Bells (count) 0
3.J. Non-Train Active Warning <input type="checkbox"/> Flagging/Flagman <input type="checkbox"/> Manually Operated Signals <input type="checkbox"/> Watchman <input type="checkbox"/> Floodlighting <input type="checkbox"/> None				3.K. Other Flashing Lights or Warning Devices Count 0 Specify type _____	
4.A. Does nearby Hwy Intersection have Traffic Signals? <input type="checkbox"/> Yes <input type="checkbox"/> No	4.B. Hwy Traffic Signal Interconnection <input type="checkbox"/> Not Interconnected <input type="checkbox"/> For Traffic Signals <input type="checkbox"/> For Warning Signs	4.C. Hwy Traffic Signal Preemption <input type="checkbox"/> Simultaneous <input type="checkbox"/> Advance	5. Highway Traffic Pre-Signals <input type="checkbox"/> Yes <input type="checkbox"/> No Storage Distance * _____ Stop Line Distance * _____	6. Highway Monitoring Devices (Check all that apply) <input type="checkbox"/> Yes - Photo/Video Recording <input type="checkbox"/> Yes - Vehicle Presence Detection <input type="checkbox"/> None	
Part IV: Physical Characteristics					
1. Traffic Lanes Crossing Railroad Number of Lanes _____ <input type="checkbox"/> One-way Traffic <input type="checkbox"/> Two-way Traffic <input type="checkbox"/> Divided Traffic		2. Is Roadway/Pathway Paved? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	3. Does Track Run Down a Street? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	4. Is Crossing Illuminated? (Street lights within approx. 50 feet from nearest rail) <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Crossing Surface (on Main Track, multiple types allowed) Installation Date * (MM/YYYY) ____/____/_____ <input type="checkbox"/> 1 Timber <input type="checkbox"/> 2 Asphalt <input type="checkbox"/> 3 Asphalt and Timber <input type="checkbox"/> 4 Concrete <input type="checkbox"/> 5 Concrete and Rubber <input type="checkbox"/> 6 Rubber <input type="checkbox"/> 7 Metal <input type="checkbox"/> 8 Unconsolidated <input type="checkbox"/> 9 Composite <input checked="" type="checkbox"/> 10 Other (specify) _____					
6. Intersecting Roadway within 500 feet? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Approximate Distance (feet) _____			7. Smallest Crossing Angle <input checked="" type="checkbox"/> 0° - 29° <input type="checkbox"/> 30° - 59° <input type="checkbox"/> 60° - 90°		8. Is Commercial Power Available? * <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Part V: Public Highway Information					
1. Highway System <input type="checkbox"/> (01) Interstate Highway System <input type="checkbox"/> (02) Other Nat Hwy System (NHS) <input type="checkbox"/> (03) Federal AID, Not NHS <input type="checkbox"/> (08) Non-Federal Aid		2. Functional Classification of Road at Crossing <input type="checkbox"/> (0) Rural <input type="checkbox"/> (1) Urban <input type="checkbox"/> (1) Interstate <input type="checkbox"/> (5) Major Collector <input type="checkbox"/> (2) Other Freeways and Expressways <input type="checkbox"/> (3) Other Principal Arterial <input type="checkbox"/> (6) Minor Collector <input type="checkbox"/> (4) Minor Arterial <input type="checkbox"/> (7) Local		3. Is Crossing on State Highway System? <input type="checkbox"/> Yes <input type="checkbox"/> No	4. Highway Speed Limit _____ MPH <input type="checkbox"/> Posted <input type="checkbox"/> Statutory
7. Annual Average Daily Traffic (AADT) Year 1986 AADT _____		8. Estimated Percent Trucks _____%		9. Regularly Used by School Buses? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Average Number per Day 0	10. Emergency Services Route <input type="checkbox"/> Yes <input type="checkbox"/> No
Submission Information - This information is used for administrative purposes and is not available on the public website.					
Submitted by _____ Organization _____ Phone _____ Date _____					
Public reporting burden for this information collection is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. According to the Paperwork Reduction Act of 1995, a federal agency may not conduct or sponsor, and a person is not required to, nor shall a person be subject to a penalty for failure to comply with, a collection of information unless it displays a currently valid OMB control number. The valid OMB control number for information collection is 2130-0017. Send comments regarding this burden estimate or any other aspect of this collection, including for reducing this burden to: Information Collection Officer, Federal Railroad Administration, 1200 New Jersey Ave. SE, MS-25 Washington, DC 20590.					

Comparison of 1988, 1999, and 2005 DNL Contours



DNL Calculator

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the **Day/Night Noise Level Calculator Electronic Assessment Tool Overview (/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/)**.

Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- **Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- **Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID	Orangeburge
Record Date	02/06/2023
User's Name	Bergmann
Road # 1 Name:	SR 303

Road #1

Vehicle Type	Cars <input checked="" type="checkbox"/>	Medium Trucks <input checked="" type="checkbox"/>	Heavy Trucks <input checked="" type="checkbox"/>
Effective Distance	75	75	75
Distance to Stop Sign			
Average Speed	36	36	36
Average Daily Trips (ADT)	14525	1810	956
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	63	64	71
Calculate Road #1 DNL	73	Reset	

Railroad #1 Track Identifier: CSXT

Rail # 1

Train Type	Electric <input type="checkbox"/>	Diesel <input checked="" type="checkbox"/>
Effective Distance		50
Average Train Speed		47
Engines per Train		2
Railway cars per Train		50
Average Train Operations (ATO)		30
Night Fraction of ATO		53
Railway whistles or horns?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Bolted Tracks?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>

Train DNL

0

78

Calculate Rail #1 DNL

78

Reset

Add Road Source

Add Rail Source

Airport Noise Level

Loud Impulse Sounds?

☐ Yes ☐ No

Combined DNL for all
Road and Rail sources

0

Combined DNL including Airport

Site DNL with Loud Impulse Sound

Calculate

Reset

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative:** Cancel the project at this location

- **Other Reasonable Alternatives:** Choose an alternate site
- **Mitigation**
 - Contact your Field or Regional Environmental Officer (</programs/environmental-review/hud-environmental-staff-contacts/>)
 - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
 - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
 - Incorporate natural or man-made barriers. See *The Noise Guidebook* (</resource/313/hud-noise-guidebook/>)
 - Construct noise barrier. See the Barrier Performance Module (</programs/environmental-review/bpm-calculator/>)

Tools and Guidance

Day/Night Noise Level Assessment Tool User Guide (</resource/3822/day-night-noise-level-assessment-tool-user-guide/>)

Day/Night Noise Level Assessment Tool Flowcharts (</resource/3823/day-night-noise-level-assessment-tool-flowcharts/>)

210033528A - WPT Orangetown
Noise Analysis Summary
Peak Hour Maximum Noise Level (Lmax)

All sound levels are in A-weighted decibels.

Orangetown Noise Ordinance

7am to 11pm, <80 dBA at or beyond source property line

11pm to 8am, <50 dBA at or beyond source property line

Predicted Peak Hour Maximum (Lmax) Noise Levels

Residence	Predicted Lmax
15 Mountain View Avenue Property Line	91.0
17 Mountain View Avenue Property Line	84.9

Sound Level Equations

Sound Power to Sound Pressure	$L_p = L_w - 20 \cdot \log_{10}(\text{distance in feet}) - 8$	(Eq 1)
Sound Pressure to Sound Pressure	$L_{p2} = L_{p1} - 20 \cdot \log_{10}(R2/R1)$	(Eq 2)
Usage Correction Factor	$L_{eq} = L_{max} + 10 \cdot \log_{10}(\text{usage factor}/100)$	(Eq 3)

Noise Sources

Quantity	Source Type	Typical Source Sound Level (Max)	Reference Distance (ft)	Usage Factor (%)
1	1000 kVA Transformer	58	3	100
2	Diesel Truck Entering/Exiting	84	50	100
2	Diesel Truck Backing Up	84	50	100
8	Diesel Truck Idling	76	50	100
2	Backup Alarms	85	50	100

Sound Level Predictions

Source No.	Source Description	Reference Sound Level	Usage Factor Correction	Distance to Receiver 1 (ft)	Distance to Receiver 2 (ft)	Sound Level at Receiver 1	Sound Level at Receiver 2
1	1000 kVA Transformer	58	0.0	82	72	29.3	30.4
2	Truck Accelerating (Entryway)	84	0.0	41	100	85.7	78.0
3	Truck Accelerating (Exitway)	84	0.0	29	88	88.8	79.1
4	Backup Alarm (Bay 1)	85	0.0	147	133	75.7	76.5
5	Backup Alarm (Bay 2)	85	0.0	159	147	74.9	75.6
6	Truck Backing Up (Bay 1)	84	0.0	147	133	74.7	75.5
7	Truck Backing Up (Bay 2)	84	0.0	159	147	73.9	74.6
8	Truck Idling (Bay 3)	76	0.0	173	161	65.2	65.9
9	Truck Idling (Bay 4)	76	0.0	187	174	64.6	65.1
10	Truck Idling (Bay 5)	76	0.0	200	188	64.0	64.5
11	Truck Idling (Bay 6)	76	0.0	227	214	62.9	63.4
12	Truck Idling (Bay 7)	76	0.0	240	228	62.4	62.8
13	Truck Idling (Bay 8)	76	0.0	253	242	61.9	62.3
14	Truck Idling (Bay 9)	76	0.0	267	255	61.5	61.8
15	Truck Idling (Bay 10)	76	0.0	281	268	61.0	61.4
Total Sound Level						91.0	84.9



Engineering
& Design

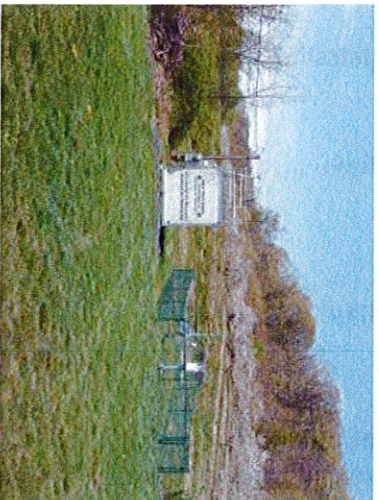
AIR QUALITY DATA AND REPORTS

Phase I Environmental Site Assessment

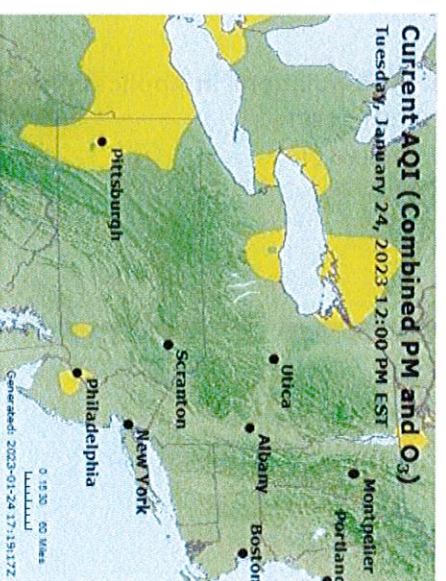
1025 Washington Pike (Tax Parcel ID 0255-B00009-0000-00)

Township of Collier, Allegheny County, PA

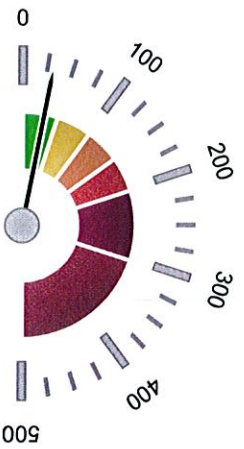
Rockland County



Station Info	
Station Name	Rockland County
Location	
Region	3
Owner	NYSDEC
Purpose	AIR QUALITY
Latitude	41.182101
Longitude	-74.028167
Elevation	0
Environment	Conklin Orchard



Current Air Quality Index
31



Last Received Values

1/24/2023 10:00 AM	
O ₃	0.034 [ppm]
BP	29.56 [in HG]
PM _{2.5C}	7.0 [ug/m3LC]

Registration ID: 3-3924-00102/00003

Ren: 3

AIR FACILITY REGISTRATION CERTIFICATE
in accordance with 6 NYCRR Subpart 201-4

Registration Issued to: TIFFANY CLEANERS INC
500 RTE 303
ORANGEBURG,NY 10962

Contact: ERIC CHUNG
500 ROUTE 303
ORANGEBURG,NY 10962-1300
(845) 359-7757

Facility: TIFFANY CLEANERS
500 RT 303
ORANGEBURG,NY 10962

Description:

Drycleaning facility operating (1) InnoClean AC600 machine. Facility uses DF-2000 solvent.

Building: ☐ Vapor Barrier Installed ☒ General Exhaust Ventilation System Installed
☒ Mixed Use Building Type **Tenant Types:** Other

Dry Cleaning Machines:

Manufacturer / Series / Model	Serial Number	Installed	Manufactured
InnoClean / Inno Clean / AC600	195195-0165	07/04/2020	2019
<input checked="" type="checkbox"/> Spill Pan Capacity (Lbs): 60 Solvent Gal/Yr: 30			
Solvent Type: DF-2000; CAS 64742-48-9, synthetic hydrocarbon, ExxonMobil			
Machine Type: Alternative Solvent Dry Cleaning Machine: Dry-to-dry, closed-loop dry cleaning machine that is equipped with a refrigerated condenser as the primary control system			

Total Number of Emission Points: 1**Cap By Rule:** No**Authorized Activity By Standard Industrial Classification Code:**

7216 - DRY CLEANING PLANTS, EXCEPT RUGS

Registration Effective Date: 03/26/2021**Registration Expiration Date:** 03/25/2031**List of Regulations in Application:**

6 NYCRR Part 201 Permits and Registrations
6 NYCRR Part 211 General Prohibitions

Registration ID: 3-3924-00102/00003

Ren: 3

AIR FACILITY REGISTRATION CERTIFICATE
in accordance with 6 NYCRR Subpart 201-4

List of Regulations in Application:

6 NYCRR Part 232

Dry Cleaning Facilities

REGION 3 AIR POLLUTION CONTROL ENGINEER

This registrant is required to operate this facility in accordance with all air pollution control applicable Federal and State laws and regulations. Failure to comply with these laws and regulations is a violation of the ECL and the registrant is subject to fines and/or penalties as provided by the ECL. If ownership of this facility changes, the registrant is required to notify the Department at the address shown above using the appropriate forms and procedures within 30 days after the transfer takes place. The present registrant will continue to be responsible for all fees and penalties until the Department has been notified of any change in ownership.



AIR FACILITY REGISTRATION CERTIFICATE
in accordance with 6 NYCRR Subpart 201-4

Registration Issued to: GENSINGER AUTO BODY INC
30 GREENBUSH RD
ORANGEBURG, NY 10962

Contact: DAVE GENSINGER
GENSINGER AUTO BODY
30 GREENBUSH RD
ORANGEBURG, NY 10962
(845) 359-2680

Facility: GENSINGER AUTO BODY
30 GREENBUSH RD
ORANGEBURG, NY 10962

Description:

Auto body repair facility which operates a surface coating process. The facility uses HVLP spray guns and compliant coatings.

Total Number of Emission Points: 1

Cap By Rule: No

Authorized Activity By Standard Industrial Classification Code:

7532 - TOP AND BODY REPAIR AND PAINT SHOPS

Registration Effective Date: 04/04/2013

Registration Expiration Date: 04/04/2023

List of Regulations in Application:

6 NYCRR Part 201	Permits and Registrations
6 NYCRR Part 212	General Process Emission Sources
6 NYCRR Part 228	Surface Coating Processes
40 CFR Part 63	National Emissions Standards for Hazardous Air Pollutants

GEORGE A SWEIKERT
REGION 3 AIR POLLUTION CONTROL ENGINEER
NYSDEC - REGION 3
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561-1696

This registrant is required to operate this facility in accordance with all air pollution control applicable Federal and State laws and regulations. Failure to comply with these laws and regulations is a violation of the ECL and the registrant is subject to fines and/or penalties as provided by the ECL. If ownership of this facility changes, the registrant is required to notify the Department at the address shown above using the appropriate forms and procedures within 30 days after the transfer takes place. The present registrant will continue to be responsible for all fees and penalties until the Department has been notified of any change in ownership.



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3924-00093/00016
Effective Date: 03/17/2015 Expiration Date: 03/16/2025

Permit Issued To: NICE PAK PRODUCTS INC
2 NICE-PAK PARK
ORANGEBURG, NY 10962-1376

Contact: SETH PETRONIO
2 NICE-PAK PARK
ORANGEBURG, NY 10962
(845) 365-1700

Facility: NICE-PAK PRODUCTS
2 NICE-PAK PARK
ORANGEBURG, NY 10962

Contact: SETH PETRONIO
2 NICE-PAK PARK
ORANGEBURG, NY 10962
(845) 365-1700

Description:

Nice-Pak Products produces moist towelettes for different uses. The facility's primary operations consist of mixing, filling, packaging and cleaning. Emission sources include flexible packaging machines, aboveground and underground storage tanks and batch mixing tanks.

Renewal 1

This renewal serves to add eight batch mixing tanks; three are sized at 3,500 gallons, three are sized at 750 gallons and two are sized at 500 gallons. The two 500 gallon tanks will be used to mix ethyl alcohol, water and batch ingredients containing VOCs. The remaining six larger tanks will be used to mix specially denatured alcohol, water, glycol ethers and batch ingredients containing VOCs. All eight tanks will be added under one new emission unit, U-28, with one single emission point, 00028. VOC potential to emit remains below 18 tons per year.

New York State Department of Environmental Conservation
Facility DEC ID: 3392400093



This renewal also serves to remove emission unit U-18 and its associated sources, processes and emission points. The flexographic printing presses were removed from the facility in May of 2014.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: GEORGE A SWEIKERT
 NYSDEC - REGION 3
 21 S PUTT CORNERS RD
 NEW PALTZ, NY 12561-1696

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and
Determinations
Applications for permit renewals, modifications and transfers
Permit modifications, suspensions or revocations by the Department

Facility Level

Submission of application for permit modification or
renewal-REGION 3 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.



Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 3
HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: NICE PAK PRODUCTS INC
2 NICE-PAK PARK
ORANGEBURG, NY 10962-1376

Facility: NICE-PAK PRODUCTS
2 NICE-PAK PARK
ORANGEBURG, NY 10962

Authorized Activity By Standard Industrial Classification Code:
2834 - PHARMACEUTICAL PREPARATIONS
2844 - TOILET PREPARATIONS

Permit Effective Date: 03/17/2015

Permit Expiration Date: 03/16/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 211.1: Air pollution prohibited

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 2 ECL 19-0301: Contaminant List
- 3 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 4 6 NYCRR Subpart 201-5: Emission Unit Definition
- 5 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 6 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 7 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 8 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 9 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,



required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



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

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

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

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

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

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

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

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

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

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



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

- Item K: Open Fires Prohibitions - 6 NYCRR 215.2**
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.
- Item 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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Air pollution prohibited



Effective between the dates of 03/17/2015 and 03/16/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 1.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 2: Contaminant List
Effective between the dates of 03/17/2015 and 03/16/2025



Applicable State Requirement:ECL 19-0301

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

No contaminants.

Condition 3: Malfunctions and start-up/shutdown activities
Effective between the dates of 03/17/2015 and 03/16/2025

Applicable State Requirement:6 NYCRR 201-1.4

Item 3.1:

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

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

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

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

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

Condition 4: Emission Unit Definition

New York State Department of Environmental Conservation

Permit ID: 3-3924-00093/00016

Facility DEC ID: 3392400093



Effective between the dates of 03/17/2015 and 03/16/2025

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 4.1:

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

Emission Unit: U-00001

Emission Unit Description:

The flexible packaging operation in the manufacturing area. It includes thirteen (13) emission points and sixty-four (64) flexible packaging machines. A maximum of four machines can be vented through one emission point.

Building(s): MAIN

Item 4.2:

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

Emission Unit: U-00014

Emission Unit Description:

Two material storage tanks. Tanks T-103 and T-104 store isopropyl alcohol. Each tank has its own vent.

Building(s): MAIN

Item 4.3:

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

Emission Unit: U-00015

Emission Unit Description:

Two material storage tanks. Tanks T-105 and T-106 store specially denatured alcohol. Each tank has its own vent.

Building(s): MAIN

Item 4.4:

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

Emission Unit: U-00016

Emission Unit Description:

Two material storage tanks. Tanks T-101 and T-102 store isopropyl alcohol and specially denatured alcohol. Each tank has its own vent.

Building(s): MAIN

Item 4.5:

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

Emission Unit: U-00017

Emission Unit Description:

Five alcohol mixing tanks in the liquid department. All five tanks are vented through one emission point.

Building(s): MAIN



Item 4.6:

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

Emission Unit: U-00019

Emission Unit Description:

Underground storage tank with a design capacity of 10,000 gallons which is used to store isopropyl alcohol.

Building(s): MAIN

Item 4.7:

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

Emission Unit: U-00020

Emission Unit Description:

Underground storage tank farm consisting of three 20,000 gallon tanks. Each tank is divided into two 10,000 gallon compartments. The liquids stored in the tanks include isopropyl alcohol, specially denatured alcohol, witch hazel (containing 14-15% ethyl alcohol) and butoxyethanol. These materials are used in the liquid department of the facility.

Item 4.8:

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

Emission Unit: U-00026

Emission Unit Description:

Operation of a 90 gallon surge tank used to blend 70% isopropyl alcohol.

Item 4.9:

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

Emission Unit: U-00027

Emission Unit Description:

Bleach filling line using a bleach solution.

Building(s): MAIN

Item 4.10:

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

Emission Unit: U-00028

Emission Unit Description:

Eight batch mixing tanks; three are sized at 3,500 gallons, three are sized at 750 gallons and two are sized at 500 gallons. The two 500 gallon tanks will be used to mix ethyl alcohol, water and batch ingredients containing VOCs. The remaining six larger tanks will be used to mix specially denatured alcohol, water, batch ingredients containing VOCs and glycol ethers.

Building(s): MAIN

Condition 5: Renewal deadlines for state facility permits
Effective between the dates of 03/17/2015 and 03/16/2025



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

Item 5.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 6: Compliance Demonstration
Effective between the dates of 03/17/2015 and 03/16/2025

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

Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 3
21 South Putt Corners Rd.
New Paltz, NY 12561

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 12 calendar month(s).

Condition 7: Visible Emissions Limited
Effective between the dates of 03/17/2015 and 03/16/2025

Applicable State Requirement:6 NYCRR 211.2

Item 7.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**** Emission Unit Level ****

New York State Department of Environmental Conservation

Permit ID: 3-3924-00093/00016

Facility DEC ID: 3392400093



Condition 8: Emission Point Definition By Emission Unit
Effective between the dates of 03/17/2015 and 03/16/2025

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 8.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00001

Emission Point: 00001

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00002

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00003

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00004

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00005

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00006

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00007

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00008

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00009

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00010

Height (ft.): 37

NYTMN (km.): 4544.7

Diameter (in.): 8

NYTME (km.): 588.8

Building: MAIN

Emission Point: 00011

Height (ft.): 37

Diameter (in.): 8

New York State Department of Environmental Conservation
Permit ID: 3-3924-00093/00016 Facility DEC ID: 3392400093



NYTMN (km.): 4544.7	NYTME (km.): 588.8	Building: MAIN
Emission Point: 00012		
Height (ft.): 37	Diameter (in.): 8	
NYTMN (km.): 4544.7	NYTME (km.): 588.8	Building: MAIN
Emission Point: 00013		
Height (ft.): 37	Diameter (in.): 8	
NYTMN (km.): 4544.7	NYTME (km.): 588.8	Building: MAIN

Item 8.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00014		
Emission Point: 0014A		
Height (ft.): 39	Diameter (in.): 3	
NYTMN (km.): 4544.7	NYTME (km.): 588.8	Building: MAIN
Emission Point: 0014B		
Height (ft.): 39	Diameter (in.): 3	
NYTMN (km.): 4544.7	NYTME (km.): 588.8	Building: MAIN

Item 8.3:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00015		
Emission Point: 0015A		
Height (ft.): 39	Diameter (in.): 3	
NYTMN (km.): 4544.7	NYTME (km.): 588.8	Building: MAIN
Emission Point: 0015B		
Height (ft.): 39	Diameter (in.): 3	
NYTMN (km.): 4544.7	NYTME (km.): 588.8	Building: MAIN

Item 8.4:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00016		
Emission Point: 0016A		
Height (ft.): 39	Diameter (in.): 3	
NYTMN (km.): 4544.7	NYTME (km.): 588.8	Building: MAIN
Emission Point: 0016B		
Height (ft.): 39	Diameter (in.): 3	
NYTMN (km.): 4544.7	NYTME (km.): 588.8	Building: MAIN

Item 8.5:

The following emission points are included in this permit for the cited Emission Unit:

New York State Department of Environmental Conservation

Permit ID: 3-3924-00093/00016

Facility DEC ID: 3392400093



Emission Unit: U-00017

Emission Point: REF04

Height (ft.): 29

Diameter (in.): 10

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Building: MAIN

Item 8.6:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00019

Emission Point: TK001

Height (ft.): 30

Diameter (in.): 2

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Building: MAIN

Item 8.7:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00020

Emission Point: 00020

Height (ft.): 12

Diameter (in.): 3

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Emission Point: 00021

Height (ft.): 12

Diameter (in.): 3

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Emission Point: 00022

Height (ft.): 12

Diameter (in.): 3

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Emission Point: 00023

Height (ft.): 12

Diameter (in.): 3

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Emission Point: 00024

Height (ft.): 12

Diameter (in.): 3

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Emission Point: 00025

Height (ft.): 12

Diameter (in.): 3

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Item 8.8:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00026

Emission Point: 00026

Height (ft.): 39

Diameter (in.): 2

NYTMN (km.): 4544.7

NYTME (km.): 588.8



Item 8.9:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00027

Emission Point: 00027

Height (ft.): 41

Diameter (in.): 8

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Building: MAIN

Item 8.10:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00028

Emission Point: 00028

Height (ft.): 41

Diameter (in.): 8

NYTMN (km.): 4544.7

NYTME (km.): 588.8

Building: MAIN

Condition 9: Process Definition By Emission Unit

Effective between the dates of 03/17/2015 and 03/16/2025

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 9.1:

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

Emission Unit: U-00001

Process: 001

Process Description:

The flexible packaging machines dispense a liquid mixture into pouches.

Emission Source/Control: 00001 - Process

Item 9.2:

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

Emission Unit: U-00014

Process: 002

Process Description: Storage of isopropyl alcohol in two storage tanks.

Emission Source/Control: 0T103 - Process

Design Capacity: 3,500 gallons

Emission Source/Control: 0T104 - Process

Design Capacity: 3,500 gallons

Item 9.3:

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

Emission Unit: U-00015

New York State Department of Environmental Conservation

Permit ID: 3-3924-00093/00016

Facility DEC ID: 3392400093



Process: 003

Process Description:

Storage of specially denatured alcohol in two storage tanks.

Emission Source/Control: 0T105 - Process

Design Capacity: 3,500 gallons

Emission Source/Control: 0T106 - Process

Design Capacity: 3,500 gallons

Item 9.4:

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

Emission Unit: U-00016

Process: 004

Process Description:

Storage of isopropyl alcohol and specially denatured alcohol in two storage tanks.

Emission Source/Control: 0T101 - Process

Design Capacity: 3,500 gallons

Emission Source/Control: 0T102 - Process

Design Capacity: 3,500 gallons

Item 9.5:

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

Emission Unit: U-00017

Process: 005

Process Description:

Raw materials are pumped from 55 gallon drums into tanks with capacities of 1000 and 500 gallons to form a liquid batch. The tank is emptied by pumping the liquid into 55 gallon drums after batch completion. Volatile materials include isopropyl alcohol and specially denatured alcohol. These compounds are emitted when the tank is being filled.

Emission Source/Control: 01701 - Process

Emission Source/Control: 01702 - Process

Emission Source/Control: 01703 - Process

Emission Source/Control: 01704 - Process

Emission Source/Control: 01713 - Process

Item 9.6:

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

New York State Department of Environmental Conservation
Permit ID: 3-3924-00093/00016 Facility DEC ID: 3392400093



Emission Unit: U-00019
Process: 007
Process Description: Storage of isopropyl alcohol (IPA).

Emission Source/Control: TK001 - Process
Design Capacity: 10,000 gallons

Item 9.7:

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

Emission Unit: U-00020
Process: 008
Process Description:
Storage of organic liquids in six storage tank
compartments.

Emission Source/Control: 00020 - Process
Design Capacity: 10,000 gallons

Emission Source/Control: 00021 - Process
Design Capacity: 10,000 gallons

Emission Source/Control: 00022 - Process
Design Capacity: 10,000 gallons

Emission Source/Control: 00023 - Process
Design Capacity: 10,000 gallons

Emission Source/Control: 00024 - Process
Design Capacity: 10,000 gallons

Emission Source/Control: 00025 - Process
Design Capacity: 10,000 gallons

Item 9.8:

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

Emission Unit: U-00026
Process: 026
Process Description: Storage of 70% isopropyl alcohol (IPA) blend.

Emission Source/Control: TK026 - Process
Design Capacity: 90 gallons

Item 9.9:

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

Emission Unit: U-00027
Process: 027
Process Description: Bleach mixture.

New York State Department of Environmental Conservation

Permit ID: 3-3924-00093/00016

Facility DEC ID: 3392400093



Emission Source/Control: TK027 - Process
Design Capacity: 3,000 gallons

Item 9.10:

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

Emission Unit: U-00028
Process: 28A
Process Description:
Mixing of ethyl alcohol, water and batch ingredients
containing VOCs in the two 500 gallon tanks.

Emission Source/Control: 28SM1 - Process
Design Capacity: 500 gallons

Emission Source/Control: 28SM2 - Process
Design Capacity: 500 gallons

Item 9.11:

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

Emission Unit: U-00028
Process: 28B
Process Description:
Mixing of specially denatured alcohol, water, glycol
ethers and batch ingredients containing VOCs in the three
750 gallon mixing tanks and the three 3,500 gallon mixing
tanks.

Emission Source/Control: 28LG1 - Process
Design Capacity: 3,500 gallons

Emission Source/Control: 28LG2 - Process
Design Capacity: 3,500 gallons

Emission Source/Control: 28LG3 - Process
Design Capacity: 3,500 gallons

Emission Source/Control: 28MD1 - Process
Design Capacity: 750 gallons

Emission Source/Control: 28MD2 - Process
Design Capacity: 750 gallons

Emission Source/Control: 28MD3 - Process
Design Capacity: 750 gallons



New York State Department of Environmental Conservation

Registration ID: 3-3924-00017/02000

Facility DEC ID: 3-3924-00017



**AIR FACILITY REGISTRATION CERTIFICATE
in accordance with 6 NYCRR Subpart 201-4**

Registration Issued to: INSTRUMENTATION LABORATORY COMPANY
526 RTE 303
ORANGEBURG, NY 10962-1309

Contact: INSTRUMENTATION LABORATORY COMPANY
526 RTE 303
ORANGEBURG, NY 10962-1309

Facility: INSTRUMENTATION LABORATORY-DIAGNOSTICS
526 RT 303
ORANGEBURG, NY 10962

Description:

Company is engaged in the preparation, quality assurance, testing, packaging and sale of in vitro diagnostic products.

Total Number of Emission Points: 11

Cap By Rule: No

Authorized Activity By Standard Industrial Classification Code:

2835 - DIAGNOSTIC SUBSTANCES

Registration Effective Date: 02/05/2003

Registration Expiration Date: (Not Applicable)

List of Regulations in Application:

6 NYCRR Part 200	General Provisions
6 NYCRR Part 201	Permits and Registrations
6 NYCRR Part 212	General Process Emission Sources

GEORGE A SWEIKERT
REGION 3 AIR POLLUTION CONTROL ENGINEER
NYSDEC - REGION 3
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561-1696

This registrant is required to operate this facility in accordance with all air pollution control applicable Federal and State laws and regulations. Failure to comply with these laws and regulations is a violation of the ECL and the registrant is subject to fines and/or penalties as provided by the ECL. If ownership of this facility changes, the registrant is required to notify the Department at the address shown above using the appropriate forms and procedures within 30 days after the transfer takes place. The present registrant will continue to be responsible for all fees and penalties until the Department has been notified of any change in ownership.



AIR FACILITY REGISTRATION CERTIFICATE
in accordance with 6 NYCRR Subpart 201-4

Registration Issued to: PRAXAIR SURFACE TECHNOLOGIES INC
39 OLD RIDGEBURY RD
DANBURY, CT 06810

Contact: ROBERT P SNYDER
PRAXAIR ELECTRONICS
542 RTE 303
ORANGEBURG, NY 10962
(845) 398-8484

Facility: PRAXAIR SURFACE TECHNOLOGIES
542 ST RTE 303
ORANGEBURG, NY 10962

Description:

Praxair*MRC manufactures and supplies high grade metal targets to semiconductor industries. There are 3 separate departments within the facility (Qualities Metals Department, Powder Products, and Precious Metals) as well as research and development. There are a total of 28 emissions points.

Exempt sources include one generator (6 NYCRR 201-3.2(c)(6)) used for emergency back up and not on a coordinated demand program, as well as two 0.44 mmBTU/hr boilers (6 NYCRR 201-3.2(c)(1)). All run on natural gas, therefore the sources are not subject to 6 NYCRR Subpart 225 sulfur in fuel standards. A log shall be kept on site maintaining dates and run times for the generator to demonstrate compliance with the exempt status, for a period of five years.

Praxair*MRC potential to emit (PTE) of regulated pollutants do not exceed the severe non attainment area threshold emissions limits in Rockland County. Actual emissions are below 50% of the threshold limits.

Applicable regulations for this facility are as follows;

6 NYCRR Part 201-4:
Minor Facility Registrations

6 NYCRR Part 211:
§211.3 For any source not applicable to 6 NYCRR Part 212 - Praxair shall not cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR Part 212:
§212.4
(a) Praxair shall not cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2 and Table 3 of this Part for the appropriate environmental rating per emissions associated with each permitted emission point.

§212.6 Opacity of emissions limited
Praxair shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.

The Department reserves the right to request performance testing to determine compliance with all limits.

Total Number of Emission Points: 28

Cap By Rule: No

New York State Department of Environmental Conservation

Registration ID: 3-3924-00027/00039

Facility DEC ID: 3-3924-00027



**AIR FACILITY REGISTRATION CERTIFICATE
in accordance with 6 NYCRR Subpart 201-4**

Authorized Activity By Standard Industrial Classification Code:

3811 - ENGINEERING & SCIENTIFIC INSTRUMENTS(1977)

Registration Effective Date: 05/29/2013

Registration Expiration Date: 05/29/2023

List of Regulations in Application:

6 NYCRR Part 200	General Provisions
6 NYCRR Part 201	Permits and Registrations
6 NYCRR Part 211	General Prohibitions
6 NYCRR Part 212	General Process Emission Sources

GEORGE A SWEIKERT
REGION 3 AIR POLLUTION CONTROL ENGINEER
NYSDEC - REGION 3
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561-1696

This registrant is required to operate this facility in accordance with all air pollution control applicable Federal and State laws and regulations. Failure to comply with these laws and regulations is a violation of the ECL and the registrant is subject to fines and/or penalties as provided by the ECL. If ownership of this facility changes, the registrant is required to notify the Department at the address shown above using the appropriate forms and procedures within 30 days after the transfer takes place. The present registrant will continue to be responsible for all fees and penalties until the Department has been notified of any change in ownership.

Facility DEC ID: 3392400190

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility

Permit ID: 3-3924-00190/00006

Mod 0 Effective Date: 01/29/2013 Expiration Date: 01/28/2023

Mod 1 Effective Date: 07/30/2021 Expiration Date: 01/28/2023

Permit Issued To: API INDUSTRIES INC
2 GLENSHAW ST
ORANGEBURG, NY 10962

Contact: DAVID ANDERSON
2 GLENSHAW ST
ORANGEBURG, NY 10962
(845) 365-2200

Facility: ALUF PLASTICS DIVISION
2 GLENSHAW ST
ORANGEBURG, NY 10962

Contact: DAVID ANDERSON
2 GLENSHAW ST
ORANGEBURG, NY 10962
(845) 365-2200

Description:

This project consists of the modification of the air state facility permit for Aluf Plastics Division. Aluf is modifying their permit to include the installation of an improved facility ventilation system intended to reduce fugitive emissions from the plastic extrusion processes conducted on site. The facility will also increase the number of extrusion lines and storage silo emission sources as part of this application.

The proposed ventilation system will increase the amount of make-up air supplied to the various rooms and process operations, which will eliminate smoke and haze from process rooms, increase operator comfort, allow all building doors to remain closed when not in use, and balance air flow between building rooms. This project also includes the installation of door alarms and implementation other work practices intended to reduce excess fugitive emissions and odors from the facility.

Facility DEC ID: 3392400190

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: JOHN W PETRONELLA
 NYSDEC - REGION 3
 21 S PUTT CORNERS RD
 NEW PALTZ, NY 12561-1696

Authorized Signature: _____ Date: ____ / ____ / ____

Facility DEC ID: 3392400190

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

Facility DEC ID: 3392400190

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

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| 5 | 2 | Relationship of this Permit to Other Department Orders and Determinations |
| 5 | 3 | Applications for permit renewals, modifications and transfers |
| 6 | 4 | Applications for permit renewals, modifications and transfers |
| 6 | 5 | Permit modifications, suspensions or revocations by the Department |

Facility Level

- | | | |
|---|---|--|
| 6 | 6 | Submission of application for permit modification or renewal
-REGION 3 HEADQUARTERS |
| 7 | 7 | Submission of application for permit modification or
renewal-REGION 3 HEADQUARTERS |

Facility DEC ID: 3392400190

DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 1-1: Applications for permit renewals, modifications and transfers

Facility DEC ID: 3392400190

Applicable State Requirement: 6 NYCRR 621.11**Item 1-1.1:**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 1-1.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 1-1.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department**Applicable State Requirement: 6 NYCRR 621.13****Item 4.1:**

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ********Condition 1-2: Submission of application for permit modification or renewal
-REGION 3****HEADQUARTERS****Applicable State Requirement: 6 NYCRR 621.6 (a)****Item 1-2.1:**

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054

Facility DEC ID: 3392400190

Condition 5: Submission of application for permit modification or renewal-REGION 3

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: API INDUSTRIES INC
2 GLENSHAW ST
ORANGEBURG, NY 10962

Facility: ALUF PLASTICS DIVISION
2 GLENSHAW ST
ORANGEBURG, NY 10962

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

Mod 0 Permit Effective Date: 01/29/2013

Permit Expiration Date: 01/28/2023

Mod 1 Permit Effective Date: 07/30/2021

Permit Expiration Date: 01/28/2023

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

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- 23 13 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 25 14 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=0-00001,Proc=001

- 28 1-17 6 NYCRR 201-5.3 (c): Compliance Demonstration

EU=0-00003,Proc=003

- 29 1-18 6 NYCRR 201-5.3 (c): Compliance Demonstration

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

FEDERALLY ENFORCEABLE CONDITIONS

Mod 1/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

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

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

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1-1: Maintenance of Equipment
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement: 6 NYCRR 200.7

Item 1-1.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 1-2: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement: 6 NYCRR 200.7

Item 1-2.1:

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

Emission Unit: 0-00001

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The facility is required to perform all preventative maintenance as required by the Ozone Generator Procedures. The unit shall be visually inspected at a minimum of once monthly, as well as cleaned at a frequency of no greater than every 30 days. The date and time of the inspection, as well as the technician and conclusions found must be recorded in a maintenance logbook. Records should be maintained in a logbook and retained for a minimum of 5 years. Any defective, broken, or inoperable parts identified during the inspection shall be promptly

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replaced. The facility must have Ozone Generator replacement parts at the facility or ordered within five days after the inspection identifying that a part requires replacement.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-3: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-3.1:

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

Emission Unit: 0-00001

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator must maintain the Ozone Generator in good working condition as required by 6 NYCRR Section 200.7 and in accordance with the approved Ozone Generator Procedures specified by the manufacturer. A copy of the approved Ozone Generator Procedures shall be maintained on site with the permit for this facility at all times. The facility owner or operator must periodically review and update the Ozone Generator Procedures as required by the manufacturer.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-4: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 200.7

Replaces Condition(s) 2

Item 1-4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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Aluf Plastics shall operate and maintain the particulate removal systems and carbon adsorption units in accordance with good engineering practice and engineering specification. Particulate removal systems and carbon adsorption units, including in-line carbon filters and in-line HEPA filters, shall be inspected weekly and exchanged as needed in accordance with good engineering practice and engineering specifications. Breakthrough of the carbon adsorption units shall be avoided by implementing scheduled replacement based on the engineering design. Facility shall perform weekly inspections of all filters.

In the event a nuisance condition is detected prior to scheduled maintenance, Aluf Plastics must perform an investigation and corrective action within 24 hours. The Department shall be notified of each nuisance condition immediately. Such notification shall describe the cause of the nuisance condition and any corrective action completed. Instances which require more than 24 hours to complete corrective action must be itemized and acceptable to the Department.

Aluf Plastics must keep records of the date and description of each scheduled and unscheduled maintenance procedure completed. The facility will also keep records of inspection and replacement dates. These records must be maintained onsite and available for Department review.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Visible Emissions Limited
Effective between the dates of 01/29/2013 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 211.2

Item 12.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 1-5: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 211.2

Item 1-5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-5.2:

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Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Except as permitted by a specific part of Title 6 of the NYCRR, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Operators of air contamination sources that are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

- 1) Observe the stack(s) or vent(s) once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).
- 2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:
 - weather condition
 - was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

- 3) If the operator observes any visible emissions (other than steam - see below) two consecutive days, then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the

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stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 57 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: ONE CONTINUOUS 6-MINUTE PERIOD PER HOUR

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

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STATE ONLY ENFORCEABLE CONDITIONS****** Facility Level ********NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 8: Contaminant List
Effective between the dates of 01/29/2013 and 01/28/2023

Applicable State Requirement:ECL 19-0301

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

No contaminants.

Condition 1-6: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-6.1:

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

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

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

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

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

Condition 10: Emission Unit Definition**Effective between the dates of 01/29/2013 and 01/28/2023****Applicable State Requirement: 6 NYCRR Subpart 201-5****Item 10.1(From Mod 1):**

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

Emission Unit: 0-00001

Emission Unit Description:

This emission unit consists of four (4) polyethylene reprocessing and extrusion lines (REPO1, REPO2, REPO3 and REPO4) that discharge through Emission Point 00011.

Emissions are captured by a dedicated exhaust hood (total of 7 hoods). Each line has at least one exhaust hood associated with it. Fumes are then subject to ozone molecules via the Ozone Generating Unit. Fumes are then

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pulled via an induced draft (ID) fan into a cyclone followed by a 3-stage filter assembly. The three stage filter consists of a blue poly pad, a pleated filter, and a 10 pocket bag filter (Vee Bag). The lines are then pulled by a second ID fan and manifold into a four stage custom built assembly. The four stage filter consists of a blue poly pad next to a pleated filter, followed by a Vee Bag, and finally a HEPA filter. From this assembly, the fumes are then sent under positive pressure to a custom pre-built filter housing with four Flanders PrecisionAire Filters (24"x24"x2"), and finally to the US Filter Model RB-10 treatment absorber equipped with 10,000 pounds of activated carbon.

Building(s): 001

Item 10.2(From Mod 1):

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

Emission Unit: 0-00002

Emission Unit Description:

This emission unit consists of 12 silos used to store plastic pellets and virgin resin.

Building(s): 001

Item 10.3(From Mod 1):

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

Emission Unit: 0-00003

Emission Unit Description:

This emission unit consists of 11 plastic bag extrusion lines using Internal Bubble Cooling Dies. Exhaust from the creation of the bubble is exhausted outside of the building via emission point 00021. The exhaust carries various Hazardous Air Pollutants (HAPs) from the melting process. The exhaust passes through both particulate controls (i.e. baffled pressure equalization chamber for primary control and 2 cyclones in series for secondary control) and formaldehyde controls (i.e. carbon adsorption) prior to being emitted.

This emission unit includes the following emission source extrusion lines:

EX300, EX301, EX302, EX303, EX304, EX401, EX402, EX403, EX404, EX405, and EX504

Building(s): 001

Item 10.4(From Mod 1):

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

Emission Unit: 0-00004

Emission Unit Description:

This emission unit consists of 6 plastic bag extrusion lines using Internal Bubble Cooling Dies. Exhaust from the

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creation of the bubble is exhausted outside of the building via emission point 00022. The exhaust carries various Hazardous Air Pollutants (HAPs) from the melting process. The exhaust passes through both particulate controls (i.e. baffled pressure equalization chamber for primary control and 2 cyclones in series for secondary control) and formaldehyde controls (i.e. carbon adsorption) prior to being emitted.

This emission unit includes the following emission source extrusion lines:

EXT15, EXT16, EXT17, EXT18, EXT21, and EXT22

Building(s): 001

Item 10.5(From Mod 1):

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

Emission Unit: 0-00005

Emission Unit Description:

This emission unit consists of 5 plastic bag extrusion lines using Internal Bubble Cooling Dies. Exhaust from the creation of the bubble is exhausted outside of the building via emission point 00023. The exhaust carries various Hazardous Air Pollutants (HAPs) from the melting process. The exhaust passes through both particulate controls (i.e. baffled pressure equalization chamber for primary control and 2 cyclones in series for secondary control) and formaldehyde controls (i.e. carbon adsorption) prior to being emitted.

This emission unit includes the following emission source extrusion lines:

EXT07, EXT08, EXT11, EXT12, and EXT13

Building(s): 001

Item 10.6(From Mod 1):

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

Emission Unit: 0-00006

Emission Unit Description:

This emission unit consists of 9 plastic bag extrusion lines using Internal Bubble Cooling Dies. Exhaust from the creation of the bubble is exhausted outside of the building via emission point 00024. The exhaust carries various Hazardous Air Pollutants (HAPs) from the melting process. The exhaust passes through both particulate controls (i.e. baffled pressure equalization chamber for primary control and 2 cyclones in series for secondary control) and formaldehyde controls (i.e. carbon adsorption) prior to being emitted.

This emission unit includes the following emission source extrusion lines:

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EXT02, EXT03, EXT05, EXT06, EXT09, EXT10, EXT14, EXT19,
and EXT20

Building(s): 001

Condition 1-7: Renewal deadlines for state facility permits
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-7.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 1-8: CLCPA Applicability
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-8.1:

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

Condition 1-9: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-9.1:

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

Emission Unit: 0-00001

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The facility is required to have at least one of the Ozone Generator units operating at all times when the retail exhaust system is running. If both Ozone Generating Units are not operational, the facility must immediately cease operation of any fragrance lines in the retail process. The facility is required to record the date and duration of any such shutdowns the plant experiences, as well as the cause of the issues and the corrective action

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performed. Records should be maintained in a logbook and retained for a minimum of 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-10: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

After a complaint is received through the facility's online complaint portal [<http://alufcommunity.com/complaint/>], the facility is required to perform the following within 60 minutes from the time a complaint is received (as indicated in the complaint form):

1. Notify NYSDEC of the complaint via email at r3.alufcomplaints@dec.ny.gov
2. Internally investigate all odor control systems for proper operation as in accordance with the manufacturer's Ozone Generator Procedures. If the odor control systems are not properly operating or if the facility operating conditions are not functioning as per the Ozone Generator Procedures, the facility must cease operations of any fragrance lines in the retail process.
3. Investigate the complaint and record any pertinent information such as detected odors, if any, at the facility and complaint location, wind speed, wind direction and facility operating conditions at the time of the complaint if the reported complaint location is within 1 mile from the facility; and
4. Perform olfactometer readings beyond the property line only if the time at which the complaint was reported was within 60 minutes from the time it was detected by the complainant (as indicated in the complaint form), and the reported complaint location is within 1 mile from the facility.

Olfactometer readings shall be collected at a point just

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beyond the facility property line relative to the complaint location and at the complaint location within 60 minutes of a complaint being received by the facility between 8AM and 5PM Monday through Friday, or as soon as practicable at all other times. If the two olfactometer readings are greater than 7 dilutions to threshold (D/T) during the investigation, then the facility must cease any processes that might be causing odors that exceed this standard. The facility is required to record the date, duration, olfactometer readings, and inspector of each olfactometer test. If the facility identifies an issue while undertaking any of the foregoing investigative actions, the facility must document the issue, identify its source cause and undertake corrective action.

All records used to determine and evaluate compliance with odor complaints must be kept at the facility (or other Department approved location) for a minimum of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-11: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-11.1:

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

Emission Unit: 0-00001

Emission Unit: 0-00003

Item 1-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator must have the vendors inspect and sample the carbon unit from the reprocessing area every 3 months during the first year after recharging the carbon unit and semi-annually thereafter. The date, time, and results of each inspection shall be maintained in log. The log must be kept on site for a period of at least 5 years.

Monitoring Frequency: QUARTERLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.
The initial report is due 1/30/2022.
Subsequent reports are due every 6 calendar month(s).

Condition 1-12: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The facility owner or operator must ensure the Reverse a Duct Bladder is maintained in good working condition and positioned properly based on the time of year. During winter operation, the inner bladder must be installed over the bottom collar to blow air up. During summer operation, the inner bladder must be installed over the top collar to blow air down. The facility owner or operator shall maintain a log of any change in bladder position and the date at which it occurs. The records shall be kept on site for a period of at least 5 years and made available to the department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-13: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The ventilation system must always be turned on during any operation at the facility. The facility owner or operator shall operate the ventilation system for a minimum of two (2) hours after the last extrusion line has been shut down on any day that the air temperature outside of the facility is over forty (40) degrees Fahrenheit and when the day following shut down is a day

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on which the facility is scheduled to operate. If the air temperature outside of the facility is 40 degrees Fahrenheit or less at the time of shut down of the last extrusion line or if the facility is not scheduled to be in operation on the subsequent day, the ventilation system shall be operated for a minimum of one (1) hour after the last extrusion line has been shut down. The facility owner or operator shall maintain records indicating the date and time the last extrusion line was shut down and the date and time the ventilation system was shut down.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

Condition 1-14: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Aluf shall install automatic closure devices and alarms on all exterior personnel doors at the facility in accordance with fire safety requirements. Alarms on exterior personnel doors shall sound locally and shall alert a shift supervisor if any door remains open longer than 15 minutes. Aluf Plastics shall maintain a record of the date and time of all door alarms for doors that remain open for longer than 15 minutes. Such records must be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Loading dock doors shall be closed when not in use. When loading dock doors are in use, Aluf Plastics shall ensure that a weatherproof seal is in place. Aluf Plastics shall post signs near the loading dock doors stating that loading dock doors must be closed when not in use.

All other material handling doors shall be equipped with plastic weather curtains.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

Condition 1-15: Compliance Demonstration**Effective between the dates of 07/30/2021 and 01/28/2023****Applicable State Requirement:6 NYCRR 201-5.3 (c)****Item 1-15.1:**

The Compliance Demonstration activity will be performed for the Facility.

Item 1-15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall
be submitted to the Regional Air Pollution Control
Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 3
21 South Putt Corners Rd.
New Paltz, NY 12561

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

Condition 3: Air pollution prohibited**Effective between the dates of 01/29/2013 and 01/28/2023****Applicable State Requirement:6 NYCRR 211.1****Item 3.1:**

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 1-16: Compliance Demonstration**Effective between the dates of 07/30/2021 and 01/28/2023****Applicable State Requirement:6 NYCRR 211.1**

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Item 1-16.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is subject to 6 NYCRR 211.1, which states:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristics or duration which are injurious to human, plant, or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

If complaints of odors are received, then the facility must promptly investigate the complaints in order to determine compliance with the requirements of 6 NYCRR § 211.1. A log shall apply corrective measures as necessary. A log of all complaints received must be kept in a bound logbook or other format acceptable to the Department.

The following data must be recorded for each observation:

The date and time of the complaint;

The name, address, and phone number of the complainant (if given);

The complainant's description of the complaint;

The facility's evaluation of the complaint; and

The corrective measure taken, if necessary.

Records should be maintained in a logbook and retained for a minimum of 5 years. A logbook shall be considered retained at the facility if electronically stored and accessible by computer at the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Condition 13: Emission Point Definition By Emission Unit
Effective between the dates of 01/29/2013 and 01/28/2023

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 13.1(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-00001

Emission Point: 00011

Height (ft.): 65

Diameter (in.): 8

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.2(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-00002

Emission Point: 00016

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00017

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00018

Height (ft.): 26

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00019

Height (ft.): 26

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00020

Height (ft.): 26

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00025

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00026

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00027

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.3(From Mod 1):

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-00003

Emission Point: 00021

Height (ft.): 26

Diameter (in.): 6

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.4(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-00004

Emission Point: 00022

Height (ft.): 65

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.5(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-00005

Emission Point: 00023

Height (ft.): 65

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.6(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-00006

Emission Point: 00024

Height (ft.): 71

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.7(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-00002

Emission Point: 00012

Height (ft.): 15

Diameter (in.): 8

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00013

Height (ft.): 8 Diameter (in.): 8

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00014

Height (ft.): 8 Diameter (in.): 8

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00015

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Height (ft.): 15 Diameter (in.): 8
NYTMN (km.): 4545.43 NYTME (km.): 588.176

Condition 14: Process Definition By Emission Unit
Effective between the dates of 01/29/2013 and 01/28/2023

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 14.1(From Mod 1):

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

Emission Unit: 0-00001
Process: 001 Source Classification Code: 3-01-018-91
Process Description:
 This process consists of the reprocessing and extrusion
 of polyethylene in four polyethylene reprocessing and
 extrusion lines.

Emission Source/Control: CAR11 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF11 - Control
Control Type: PARTICULATE TRAP

Emission Source/Control: OZONE - Control
Control Type: OZONATION

Emission Source/Control: REPO1 - Process

Emission Source/Control: REPO2 - Process

Emission Source/Control: REPO3 - Process

Emission Source/Control: REPO4 - Process

Item 14.2(From Mod 1):

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

Emission Unit: 0-00002
Process: 002 Source Classification Code: 3-01-018-64
Process Description:
 This process consists of the bulk storage of plastic
 pellets and virgin resin in storage silos.

Emission Source/Control: SIL10 - Process

Emission Source/Control: SIL11 - Process

Emission Source/Control: SIL12 - Process

Emission Source/Control: SILO1 - Process

Emission Source/Control: SILO2 - Process

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Emission Source/Control: SILO3 - Process

Emission Source/Control: SILO4 - Process

Emission Source/Control: SILO5 - Process

Emission Source/Control: SILO6 - Process

Emission Source/Control: SILO7 - Process

Emission Source/Control: SILO8 - Process

Emission Source/Control: SILO9 - Process

Item 14.3(From Mod 1):

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

Emission Unit: 0-00003

Process: 003

Source Classification Code: 3-08-010-02

Process Description:

This process consists of polyethylene extrusion to form plastic bags using Internal Bubble Cooling Dies.

Emission Source/Control: CAR21 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF21 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: EX300 - Process

Emission Source/Control: EX301 - Process

Emission Source/Control: EX302 - Process

Emission Source/Control: EX303 - Process

Emission Source/Control: EX304 - Process

Emission Source/Control: EX401 - Process

Emission Source/Control: EX402 - Process

Emission Source/Control: EX403 - Process

Emission Source/Control: EX404 - Process

Emission Source/Control: EX405 - Process

Emission Source/Control: EX504 - Process

Item 14.4(From Mod 1):

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

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

Emission Unit: 0-00004

Process: 004

Source Classification Code: 3-08-010-02

Process Description:

This process consists of polyethylene extrusion to form plastic bags using Internal Bubble Cooling Dies.

Emission Source/Control: CAR22 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF22 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: EXT15 - Process

Emission Source/Control: EXT16 - Process

Emission Source/Control: EXT17 - Process

Emission Source/Control: EXT18 - Process

Emission Source/Control: EXT21 - Process

Emission Source/Control: EXT22 - Process

Item 14.5(From Mod 1):

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

Emission Unit: 0-00005

Process: 005

Source Classification Code: 3-08-010-02

Process Description:

This process consists of polyethylene extrusion to form plastic bags using Internal Bubble Cooling Dies.

Emission Source/Control: CAR23 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF23 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: EXT07 - Process

Emission Source/Control: EXT08 - Process

Emission Source/Control: EXT11 - Process

Emission Source/Control: EXT12 - Process

Emission Source/Control: EXT13 - Process

Item 14.6(From Mod 1):

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

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Facility DEC ID: 3392400190

Emission Unit: 0-00006

Process: 006

Source Classification Code: 3-08-010-02

Process Description:

This process consists of polyethylene extrusion to form plastic bags using Internal Bubble Cooling Dies.

Emission Source/Control: CAR24 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF24 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: EXT02 - Process

Emission Source/Control: EXT03 - Process

Emission Source/Control: EXT05 - Process

Emission Source/Control: EXT06 - Process

Emission Source/Control: EXT09 - Process

Emission Source/Control: EXT10 - Process

Emission Source/Control: EXT14 - Process

Emission Source/Control: EXT19 - Process

Emission Source/Control: EXT20 - Process

Condition 1-17: Compliance Demonstration

Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: 001

Item 1-17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Aluf Plastics shall only accept film, compressed blocks, pellets, or chopped scrap polyethylene for processing at the facility. Any other type of plastic in film or any other form shall be rejected.

Aluf Plastics shall inspect each delivery of post

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industrial scrap film and determine whether it includes face printing (Incoming film with more than 25% of face printing shall be rejected).

Aluf Plastics shall make operational observations of the Repro process in order to determine whether any film is generating excessive smoke. If a film is found to generate excessive smoke, it shall be rejected in the future. The facility shall maintain a log of all rejected films and shall post the log in the scale room for use during incoming plastic inspection.

Internal scrap generated from in house processes is excluded from the inspection procedures described in this condition.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-18: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Process: 003

Item 1-18.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to prevent process temperatures from reaching the point where significant degradation of polyethylene may occur, Aluf Plastics shall ensure that temperature controllers on its extruders cause a high-temperature alarm to be activated when the extrusion melt temperature reaches 500 degrees Fahrenheit and shall implement internal procedures to respond to high temperature alarms. Aluf Plastics shall ensure that the temperature controller automatically shuts down the extruders when the extrusion melt temperature reaches 550 degrees Fahrenheit.

Aluf Plastics shall maintain a log including the date and time of each instance of high temperature alarms and/or high temperature shutdowns. Data retention for high temperature alarms shall be maintained on a ninety (90)

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day rolling report to reflect all such high temperature alarms and/or high temperature shutdowns for the immediately preceding 90 days. Results must be submitted to the department.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

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