



November 4, 2025

UMR Boards Production LLC and UMS Property LLC
26 Werner Schluter Way
Plattsburgh, NY 12901

Re: DEC ID # 5-0942-00510/00004 and 5-0942-00538/00001
Plattsburgh Facilities UMR Boards and Schluter Systems

Dear Applicants:

Please be advised that your application for a DEC permit(s) is complete and a technical review has commenced. Notice and the opportunity for public comment is required for this application. Enclosed is a Notice of Complete Application for your project. Please have the Notice published in the newspaper identified below once during the week of 11/10/2025 on any day Monday through Friday.

PRESS REPUBLICAN
170 MARGARET ST
PLATTSBURGH, NY 12901

On the Notice of Complete Application, that information presented between the horizontal lines, on the enclosed page(s) should be published. Do not print this letter or the information contained below the second horizontal line. Please request the newspaper publisher to provide you with a Proof of Publication for the Notice. Upon receipt of the Proof of Publication promptly forward it to this office. You must provide the Proof of Publication before a final decision can be rendered on your application. You are responsible for paying the cost of publishing the Notice in the newspaper.

Notification of this complete application is also being provided by this Department in the NYSDEC Environmental Notice Bulletin.

This notification does not signify approval of your application for permit. Additional information may be requested from you at a future date, if deemed necessary to reach a decision on your application. Your project is classified major under the Uniform Procedures Act. Accordingly, a decision is due within 90 days of the date of this notice unless a public hearing is held, which may extend this time frame. If a public hearing is necessary, you will be notified.

If you have any questions please contact me at the above address or phone number above.

Sincerely,

Erin M. Donhauser

Division of Environmental Permits

THIS IS NOT A PERMIT



**New York State Department of Environmental Conservation
Notice of Complete Application**

Date: November 4, 2025

Applicant: UMR Boards Production LLC and UMS Property LLC
26 Werner Schluter Way
Plattsburgh, NY 12901

Facility: Plattsburgh Facilities – UMR Boards and Schluter Systems
3 and 26 Werner Schluter Way and 26 Irish Settlement Rd
Plattsburgh, NY 12901

Application ID: 5-0942-00510/00004 and 5-0942-00538/00001

Permits(s) Applied for: 1 - Article 19 Air Title V Facility and 1 - Article 17 Titles 7 & 8 Industrial SPDES
-Groundwater Discharge

Project is located: in PLATTSBURGH in CLINTON COUNTY

Project Description:

The Department has prepared a draft Air Title V permit and State Pollutant Discharge Elimination System (SPDES) permit, and has made a tentative determination, subject to public comment or other information, to approve the above applications.

UMR Boards Production LLC and UMS Property LLC (UMR) are seeking a NYSDEC Air Title V Facility permit for the combined facilities operated by UMR and Schluter Systems LP (current production of the Kerdi-Board operation is in SSLP and referred to as "KB3") located on Tax parcels 232.-3-10.1 and 232.-3-10.2, and the proposed facility "KB4" located tax parcel 232.-3-1 in the town of Plattsburgh, Clinton County, NY (The "Schluter Systems & UMR Boards Facility" or "Facility").

UMR, SSLP (KB3) and KB4 (proposed Kerdi-Board line 4) facilities manufacture materials used for building and waterproofing tiled shower and tub installations. The principal products include molded expanded polystyrene (EPS) shower floors (shower trays) and laminated extruded polystyrene (XPS) foam core material (Kerdi-Board) for shower and tub surrounding walls and shaped parts such as benches, niches and curbs. EPS beads are prepared, thermally expanded using steam, and molded into various shower tray products. During this process, Volatile Organic Compounds (VOCs), Methylene Bisphenyl Isocyanate (MDI), and particulate matter are released.

Since approximately 2010, UMS Manufacturing, LLC, and later Schluter Systems, operated a manufacturing plant for the XPS products at the Facility (the KB3 product line). Air contaminant emissions from these activities were not authorized by permit. In 2017, UMR Boards applied for, and the Department issued, an Air State Facility permit for the EPS products at the Facility. By Order on Consent in case #R5-20211026-2363, effective March 13, 2023, Schluter Systems, UMR Boards, and UMS Property agreed to submit an application for an Air Title V permit to authorize the collective emissions from their existing Facility operations which exceed major source thresholds for VOCs. If issued, the Air Title V permit would replace the UMR Boards Air State Facility permit #5-0942-00510/00001.

The Air Title V permit application submitted by the companies would cover their existing facility emissions and would also authorize construction and operation of a new product line (KB4) intended to eventually replace KB3. KB4 production will be in a new building to be constructed on a neighboring property to the KB3 plant. By switching product lines from KB3 to KB4, the applicants expect to significantly reduce overall VOC emissions within the term of the proposed Air Title V permit.

The facility is proposing a facility-wide limit of VOCs emissions below 132 tons per year (264,000 pounds per year) by limiting EPS beads and XPS foam usage. The EPS beads throughput by weight from the UMR unit at this facility shall be limited to no more than 5,937 tons during any consecutive 12-month period, rolled monthly. The XPS foam throughput by weight from the SSLP (KB3) unit at this facility shall be limited to no more than 4,235 tons during any consecutive 12-month period, rolled monthly. The XPS resin throughput by weight from the KB4 unit at this facility shall be limited to no more than 8,760 tons during any consecutive 12-month period, rolled monthly.

During this process, the facility installed a regenerative thermal oxidizer (RTO) to reduce emissions of VOCs associated with the EPS and XPS foaming processes at the existing facility to comply with 6 NYCRR Part 212-3.1 Reasonably Available Control Technology (RACT) for Major Facilities. Under the terms of the proposed Title V permit, the facility must maintain a continuous 99% destruction efficiency of VOCs in the RTO to comply with 6 NYCRR Part 212-2.3(b). In addition, the facility owner or operator shall cease operation of the KB3 process (Emission Unit 2-0SSLP) within one year of standard/stable operations of KB4 (Emission Unit 4--0KB4), but no later than January 31, 2030.

In accordance with 6 NYCRR Parts 621.7(b)(9) and 201-6.3(c), the Administrator of the United States Environmental Protection Agency (USEPA) has the authority to bar issuance of any Title V Facility Permit if it is determined not to be in compliance with applicable requirements of the Clean Air Act or 6 NYCRR Part 201.

Persons wishing to inspect the subject Title V files, including the application with all relevant supporting materials, the draft permit, and all other materials available to the DEC (the "permitting authority") that are relevant to this permitting decision should contact the DEC representative listed below. The Draft Permit and Permit Review Report may be viewed and printed from the Department web site at: <https://dec.ny.gov/environmental-protection/air-quality/controlling-pollution-from-facilities/permits-registrations-fees>.

The new KB4 building would also require an individual SPDES permit for the discharge of up to 18,943 gallons per day of sanitary wastewater, floor wash water and a reverse osmosis backwash to groundwater. Outfall 001 for the sanitary and floor wash water would be treated through septic tanks and absorption beds. Outfall 002 for the reverse osmosis backwash will be discharged to an infiltration basin and dry well.

The draft SPDES permit with fact sheet are available online at <https://dec.ny.gov/fs/projects/draftpermits>. The draft permit files are contained within regional folders and named by the SPDES number contained in this notice.

DEC will evaluate the application, and the comments received on it to determine whether to hold a public hearing. Comments and requests for a public hearing should be in writing and addressed to the Department representative listed below. A copy of the Department's permit hearing procedures is available upon request or on the Department web site at: <https://dec.ny.gov/regulatory/permits-licenses/environmental-permits/guide-to-permit-hearings>.

Refer to this application by the application number listed above and SPDES Number NY 0296759.

Availability of Application Documents:

Filed application documents, and Department draft permits where applicable, are available for inspection during normal business hours at the address of the contact person. To ensure timely service at the time of inspection, it is recommended that an appointment be made with the contact person.

Application materials can also be found on the applicants' document repository:

<https://feature.jmt.com/umr-boards-production>

State Environmental Quality Review (SEQR) Determination:

UMR, SSLP (KB3) modification is an unlisted action. Negative declaration is on file. The KB4 proposal is a Type 1 action. A negative declaration is on file.

SEQR Lead Agency:

The KB3 modification was an uncoordinated review with no lead agency determined. The Town of Plattsburgh was the lead agency for the KB4 proposal.

State Historic Preservation Act (SHPA) Determination:

Cultural resource lists and maps have been checked. The proposed activity is not in an area of identified archaeological sensitivity and no known registered, eligible or inventoried archaeological sites or historic structures were identified or documented for the project location. No further review in accordance with SHPA is required.

DEC Commissioner Policy 29, Environmental Justice and Permitting (CP-29):

It has been determined that the proposed action is subject to CP-29 because the Facility is located in a Potential Environmental Justice Area. The Department required the applicants to prepare and implement a Public Participation Plan. The applicants held an in-person public information meeting on January 29, 2025, and submitted an implementation report to the Department which is included in the application file.

Availability For Public Comment

Comments on this project must be submitted in writing to the Contact Person no later than 12/12/2025 or 30 days after the publication date of this notice, whichever is later.

Contact Person

Erin M. Donhauser
NYSDEC
1115 NYS RTE 86
Ray Brook, NY 12977
(518) 897-1234
