

PUBLIC PARTICIPATION PLAN

Applicant:

Oneida Molded Plastics

Facility:

104 South Warner Street
Oneida, New York 13421

NYSDEC Application Number:

7-2512-00017/00025

As Required by:

NYSDEC Commissioner's Policy Guidance CP-29

Submitted to:

New York State Department of Environmental Conservation
5785 Widewaters Parkway
Syracuse, New York 13214

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Date:

May 29, 2025

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List of Acronyms

Acronym	Definition
CP-29	Commissioner Policy 29, Environmental Justice and Permitting
NOCA	Notice of Complete Application
NYSDEC	New York State Department of Environmental Conservation
PEJA	Potential Environmental Justice Area
PPP	Public Participation Plan

I. INTRODUCTION AND OBJECTIVE

This Public Participation Plan (PPP) has been prepared by Oneida Molded Plastics (OMP) (hereinafter referred to as “applicant”) to fulfill and comply with the requirements of New York State Department of Environmental Conservation **Commissioner Policy 29, Environmental Justice and Permitting (CP-29)** for their proposed installation of a robotically operated paint booth that requires a New York State Department of Environmental Conservation (NYSDEC) state facility air permit application and which has been determined by NYSDEC to potentially impact one or more potential environmental justice area (PEJA) or disadvantaged communities (DAC) within a 1/2 mile radius of the facility (See Figure 1).

This PPP has been developed in accordance with the procedures established in CP-29 Section V.D and it aims to help ensure meaningful and effective public participation throughout the NYSDEC environmental permit review process. Public participation in the NYSDEC environmental permit review process means a program of activities that provides opportunities for stakeholders to be informed about and involved during the review of a proposed action.

The objective of this PPP is to outline and describe the program of activities that the applicant will implement to actively seek and enhance public participation during the application review process.

Figure 1: Oneida Molded Plastics – EJ/DAC Applicable Communities (1/2 Mile Radius from Facility)

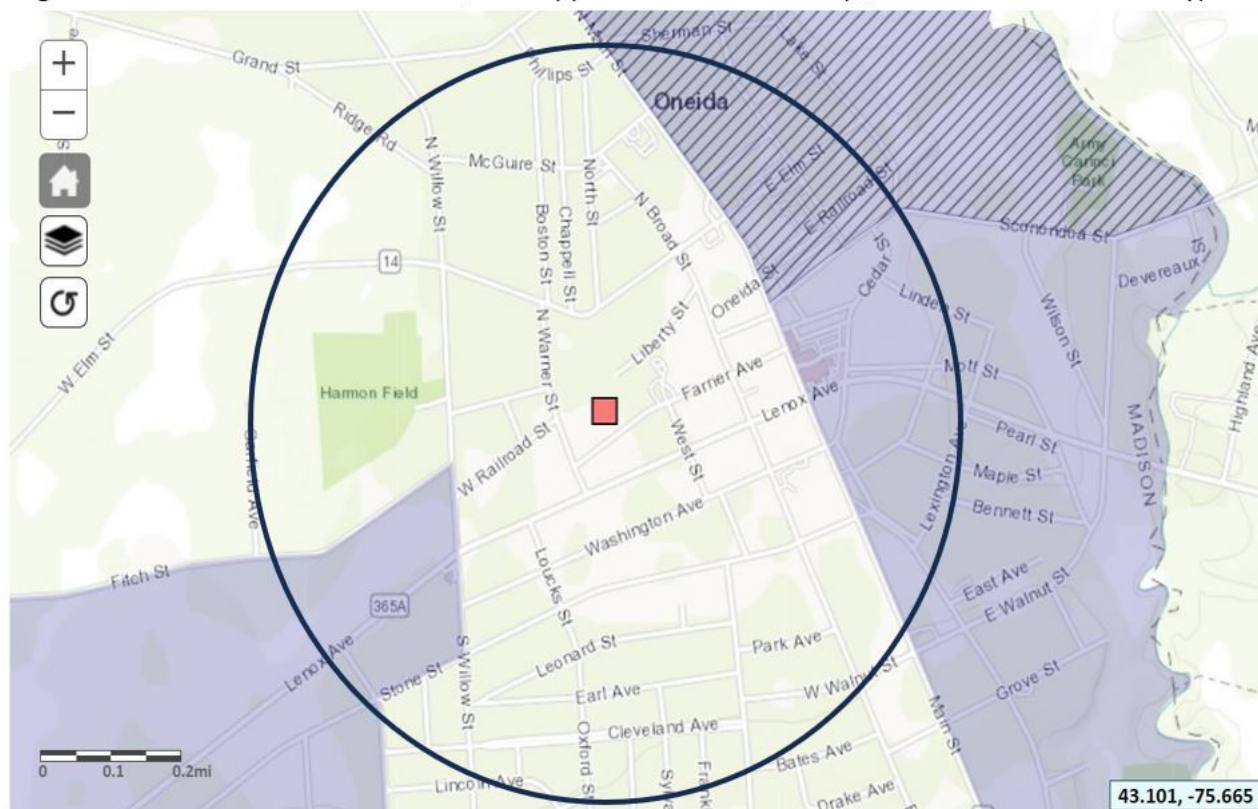


Figure 1. Project Location and Potential Environmental Justice Area(s) (in purple)

Note: The mapped disadvantages communities (DAC) are in purple and the hash marked areas illustrate mapped potential Environmental Justice Area (PEJA).

II. PROJECT DESCRIPTION AND PROPOSED ACTION

Project Overview

The applicant proposes to install and operate a robotically operated paint booth as part of the facility's overall spray painting activities. To implement the proposed project, the applicant has submitted an application to the New York State Department of Environmental Conservation (NYSDEC) for a state facility air permit to regulate air emissions associated with the proposed new paint booth, as well as the currently existing seven (7) paint booths and Pozzi hydrographic dip system.

Nature of Proposed Project/Action and Purpose

Currently the OMP facility has an Air Facility Registration with NYSDEC for the potential to emit volatile organic compounds (VOCs) from the facility's seven (7) manually applied paint booths and a Pozzi hydrographic dip system. Due to changes in the state's air regulations specific to applied coating activities (6 NYCRR 228), OMP and NYSDEC commenced a collaborative permit review process, and as a result, OMP applied for a New York State Facility Air Permit to continue covering OMP's current base manufacturing operations, as well as the proposed installation of a new robotically operated paint booth to meet increased customer demands.

OMP manufactures plastic parts. Specifically, OMP is a custom injection molding and decorating company located at 104 South Warner Street, in Oneida NY.

The company has been at this location for several decades. OMP currently provides jobs for approximately 170 people living in Oneida area. The facility operates 24 hours a day, 5 days a week with the capability of operating 24 hours a day, 7 days a week depending on the manufacturing workload to satisfy customers' needs.

One of the many decorative processes OMP provides to its customers is the ability to paint plastic molded parts. This process requires a highly skilled workforce. Currently the painting process is applied to the parts with a paint operator using a handheld spray gun.

OMP is experiencing challenges not being able to satisfy customers production requirements. This is caused by the number of parts the painters can paint by hand within a 24-hour time frame and the lack of labor force in the area to train to paint these parts. Not being able to satisfy customers needs in a timely manner has a negative impact on our company's future growth and the ability to provide more jobs for residents in the area.

To increase production capability, OMP decided to purchase a painting robot. The robot doesn't require a highly skilled painter to operate it. Because any of our operators can load and unload the parts to be painted, the robot does not eliminate operating labor.

Realizing the limiting factors to be able to paint more parts, OMP decided to purchase a robotically operated paint booth, which will increase production capacity, as well as create additional jobs.

Potential Impacts

The calculated worst case facility wide VOC emissions for this project is approximately 11 tons per year, which is significantly less than current levels (~20-24 tons per year). This is due to better overspray efficiencies and improved coating formulations (less VOC content). Specifically, the robotically operated paint booth uses approximately 29% less paint per painted part versus manually operated painting activities, thus generating less potentially harmful chemicals (volatile organic compounds and hazardous air pollutants) released into the air.

Furthermore, air dispersion modeling for the painting activities at the facility shows that the emissions for all specific VOC compounds identified in the coating formulations are well below the state and federal ambient air quality impact concentration guidelines (both short term and annual basis). These guideline concentration thresholds are based on published adverse health impact studies and data.

Finally, it is not anticipated that there will be an increase in delivery truck traffic and associated mobile air emissions from these diesel trucks with the anticipated increase in production activities from the proposed project.

On a positive note, the installation of the proposed robotically operated paint booth would not eliminate jobs. Painting with the robot would require approximately seven (7) additional full-time employees for paint mixing, material handling, quality inspection, etc.

Operating the robot does not require a skilled person to paint parts. The robot requires an operator with minimal training to load and unload the parts from the robotically operated paint booth.

The painting robot eliminates operator fatigue, the potential repetitive motion injuries, and downtime for not having skilled labor to paint parts.

The robot provides consistent painted part quality and productivity.

Painting with the robot increases daily productivity to satisfy our customer requirements. This results in company growth and opportunity for more jobs in our other manufacturing departments that support the robot.

III. STAKEHOLDER IDENTIFICATION & CONTACT LIST

A contact list consisting of the names, addresses, phone numbers, or email addresses of stakeholders to the proposed action is provided in Appendix A. The contact list includes individuals and organizations with a direct stake in the proposed action and people and individuals and organizations that have expressed interest in the proposed project or similar projects affecting the same disadvantaged neighborhood or community depicted in figure 1.

To develop a draft contact list, the applicant consulted the following local resources, such as local governmental officials, NYSDEC, and contracted a mailer company to help identify stakeholders and develop an initial contact list.

The current contact list has been developed in consultation with NYSDEC by identifying stakeholders from the following categories: local government and elected officials; business owners, residents, and occupants; local civic, community, environmental and religious organizations; local news media; administrator/operator of any school or day care that live, work and/or represent a disadvantaged neighborhood or community within a 1/2 mile radius of the project area (see Figure 1).

The applicant will utilize this contact list to communicate and disseminate information about the proposed project/action and permit application review process to the affected community and stakeholders. At minimum, this includes distribution of the written information and outreach materials described in Section V to inform the community about upcoming public meetings and opportunities for public participation.

The contact list will be reviewed periodically and updated as appropriate throughout the permit application review process. The applicant will update the contact list with any new stakeholders identified during the public meeting or execution of other PPP components. In addition, individuals and organizations will be added to the contact list upon request. Such requests should be submitted to the project liaison identified in Section IV. Other additions to the contact list may be made at the discretion of the applicant or, at the request of the NYSDEC project manager, in consultation with other NYSDEC staff, as appropriate.

IV. PROJECT LIAISON

A representative from the project team will be available during business hours at:

- Richard Harrington, Environmental Manager
- (315) 363-7680 ext. 258
- rharrington@oneidamoldedplastics.com
- 104 South Warner Street, Oneida, New York 13421

Impacted residents and interested stakeholders can contact the project liaison listed above to provide input to the project team, discuss any issues or concerns and/or to ask questions or request information. The project liaison shall respond in a timely manner and in the manner appropriate to question or information request received. The project liaison

will be responsible for tracking and documenting public input, inquiries, questions, and information requests received, along with responses provided.

V. PUBLIC OUTREACH ACTIVITIES

The applicant will utilize a range of engagement strategies and conduct various public outreach activities to facilitate participation, involvement, and direct communication with the affected community during the permit application review process. The applicant will implement the public outreach activities outlined below upon finalization and approval of this PPP by NYSDEC.

In compliance with the requirements of CP-29, the applicant will hold public information meeting(s) to keep the public informed about the proposed action and the environmental permit review process. At minimum, the applicant will prepare, distribute and post written information and materials, including a meeting notice and fact sheet, to encourage dialogue and solicit input from interested stakeholders during the permit application review process. All public outreach materials and information will be prepared and presented in an easy-to-read, understandable format, using plain language free of legal terminology, and geared towards a non-technical audience.

The public meeting notice and fact sheet will be made available and disseminated in both English and any other language based on requested needs from the community. In addition, the public can contact the project liaison regarding the availability of language assistance and to request that the notice and fact sheet are translated into another language for comprehension by non-English speaking or limited proficiency stakeholders.

Public Meeting(s)

At the discretion of NYSDEC and, depending on the scale and nature of a project, one or more virtual public meeting(s) must be conducted to satisfy the intent of CP-29.

A meeting is typically required near the end of the permit application review process to inform the public about: the status of, or, if applicable, the availability of, final application materials and draft permits for review; the pending NYSDEC public comment period, and deadline to submit written comments to NYSDEC, if established; and eventual final decision. Meetings may also be held earlier, either pursuant to this plan or possibly even earlier during the initial design phase. If meetings were held prior to submission of this PPP, a summary of them should be included as an appendix.

Public Meeting: At or Near Completeness

Applicant will facilitate a virtual public meeting or meetings on approximately two weeks following the mailing and anticipated receipt of the meeting invites. It is anticipated that the meeting will be held on June 24 2025 at 6:00 pm at the Oneida Public Library, located at 459 Main Street in Oneida, NY.

- Inform the public about the proposed project/action and permit application review status.

- Provide the opportunity to for stakeholders to ask questions and express concerns about the project and identify how to obtain information or answers to questions after the meeting has concluded.
- Inform attendees how they may submit written comments on the permit application to the NYSDEC during the public comment period and, if available, identify any applicable deadlines.

Necessary Meeting Discussion Points and Requirements

All meetings will be facilitated by the applicant and/or representatives from their project team (project personnel) via Zoom for those who wish to participate but are unable to attend the public meeting in person. During the meeting, the applicant and/or representatives from their project team will present a brief overview of the project, including any relevant background information, details on the permitting action, scope of work, schedule, and community impacts. The second part of the meeting will include a question-and answer-portion where the floor will be open for attendees to ask questions, make remarks, and/or express concerns. In addition, the following discussion points will be addressed:

- Provide an update on the permit application review process and identify outstanding application requirements and future milestones in the application review process.
- Make it clear that the meeting is being held prior to NYSDEC's permitting decision for the project/action.
- Identify the location of the online document repository and provide directions on how attendees may obtain and review materials relevant to the application, documents related to the meeting and other public participation plan components.
- Identify and provide contact information for the project liaison and announce procedures for how attendees may obtain answers to questions after the meeting has concluded and interested stakeholders can submit questions, express concerns, or request additional information by telephone, email, and in writing.
- Announce any future outreach, opportunities for public participation, and /or required follow-up with attendees including, but not limited to: additional meetings and future mailings, including, but not limited to the Notice of Complete Application.

Attendance will be recorded during the virtual meeting by an attendance sign-in for those individuals participating in person and a recorded attendance taken for those individuals participating virtually. The applicant will track the number of attendees for all meetings held during implementation of this PPP and, where feasible and applicable, identify any affiliation of participants and interests represented at the meeting. In addition, the applicant will be responsible for documenting meeting notes or minutes, along with a record of comments and questions raised in the meeting and respective responses and answers provided. Attendees not identified on the contact list will have the option to be added in the event of future meetings or information sharing.

Virtual Public Meeting Notice Preparation and Distribution

Information regarding the details of the virtual public meeting(s) and how to participate via computer and/or telephone is contained in the reader-friendly meeting notice(s) shown in Appendix B. The notice has been prepared in English and will be translated, upon request, by a certified translator. Through this notice, the public will be invited and encouraged to attend the public virtual meeting scheduled on June 24, 2025 at 6:00 pm. Specific date/time will be published approximately two weeks and will be distributed in the mailers, as well as local newspaper outlet.

Once the PPP has been approved by NYSDEC the public meeting notice will be posted and available in the online document repository described in Section VI of this document. At least two weeks in advance of the public virtual meeting, the notice will be published in the Oneida Daily Dispatch which is a newspaper printed, published, and circulated daily in City of Oneida, New York vicinity. In addition, the public meeting notice will be emailed, mailed and/or hand delivered (door-to-door) to the stakeholders identified in the contact list in Appendix A at least two weeks prior to the public virtual meeting.

Fact Sheet Preparation and Distribution

Factual information on the proposed project/action, including an overview, purpose statement, and potential impacts, is outlined in the reader-friendly fact sheet shown in Appendix C. In addition, the fact sheet outlines how interested stakeholders can: participate in the permit application review process; access the online document repository to review relevant application materials prior to the public meeting; and contact the project team to obtain additional information. The fact sheet has been prepared in English and will be translated upon request by a certified translator.

Once the PPP has been approved by NYSDEC the fact sheet will be posted and available in the online document repository described in Section VI of this document. No later than 2 weeks prior to the public meeting, the applicant will distribute the fact sheet to provide stakeholders with relevant background on the proposed project/action and facilitate meaningful participation during the meeting. The fact sheet will be distributed together with the public meeting notice via email, mail and/or hand delivery (door-to-door).

The fact sheet(s) will also be posted within the vicinity of the project site and visible to the public. For example, they may be posted on some streetlight lampposts or bulletin boards located in the lobby of residential complex buildings or public facilities such as libraries, schools, or community centers within the project site.

Distribution of Notice of Complete Application

Once NYSDEC determines the application(s) for the proposed action/project is complete and provides the Notice of Complete Application (NOCA) to the applicant, the applicant will distribute the NOCA and draft permit, if applicable, to the meeting attendees and any identified interested parties, to provide notification regarding the start of the NYSDEC public comment period and to announce the deadline for submission of written comments

to NYSDEC. If the NOCA is available at the time of the meeting, the applicant will distribute the NOCA at the public meeting. If the NOCA is not available at the time of the meeting, the applicant will provide explicit instructions on how to access the online repository and inform the attendees that, once available, the NOCA will be posted to the online document repository and will be distributed to attendees via email or mail as soon as possible, but no later than the date that the NOCA is published by the applicant in the print edition of a paid local newspaper that is circulated at least weekly and available in the municipality in which the project is located.

VI. DOCUMENT REPOSITORY

An online document repository has been established for the community and interested stakeholders to access and review information about the project. The online repository available at www.oneidamoldedplastics.com will provide information and documents relating to the project and permit application.

The repository will be updated throughout the application process with project-related information and written materials (i.e., application forms and supporting materials, draft permit, fact sheet, statement of basis (where applicable), the Notice of Complete Application provided by the NYSDEC, etc.).

VII. SUBMISSIONS

Progress Report

No later than two weeks following the early engagement meeting described in Section V, the applicant will submit a progress report to NYSDEC in the form of a brief memorandum or cover letter. At minimum, the progress report shall:

- describe progress to-date in implementing the approved PPP, identify the components of the plan yet to be implemented, and the timeline for completion of the PPP.
- summarize the public meeting (identify the time and date, number, affiliation and diversity of attendees and interests represented) and include or append copies of the written materials (i.e. virtual public meeting notice, fact sheet) along with any documentation that supports implementation of public outreach activities described in Section V, such as: the meeting sign-in sheet, record of attendees/participants, meeting presentation, notes or minutes, summary of questions and answers, and copy of newspaper notice or other proof of publication.
- identify any language or disability assistance requests received and document any considerations or accommodations made to-date,
- summarize or include a table that documents:
 - all substantive concerns raised to-date, either during the public meeting, or, received by the project liaison, along with responses provided by the applicant
 - all resolved and outstanding issues

- explain any project, design changes and/or measures to reduce potential impacts, either as result of community/public input or NYSDEC permitting review process.

The progress report will become part of the application record and will be posted to the online document repository so that it is readily available to the public.

Final Summary Report and Written Certification

Upon completion of the enhanced public participation plan, the applicant will submit written certification to NYSDEC to certify that it has fully executed and complied with the approved PPP. The certification shall be signed by the applicant, or the applicant's agent, and submitted to NYSDEC prior to a final decision on the application.

As part of the certification, the applicant shall submit a final summary report documenting the implementation of this PPP. The report will summarize the activities that occurred in accordance with the PPP and will identify any substantive concerns raised by stakeholders during the public meeting, or, at any time throughout the permitting process and detail the applicant's response(s) to any such concerns or questions. The applicant will include, or append, any documentation that supports the final summary report, such as: the meeting sign-in sheet(s), record of attendees/participants, meeting presentation, notes or minutes, summary of questions and answers, and copy of newspaper notice or other proof of publication. In addition, the report will identify any changes or modifications to the proposed project that were made or considered by the applicant to address or reduce concerns surrounding the permit application.

The final summary report and written certification will become part of the application record and will be posted to the online document repository so that it is readily available to the public.

APPENDIX A

Contact List

APPENDIX B

Virtual Public Meeting Notice

YOU ARE INVITED

Virtual Public Meeting
June 24, 2025 at 6:00 pm
Oneida Molded Plastics Proposed Air Permit Modification

Oneida Molded Plastics (OMP) has submitted an application to the New York State Department of Environmental Conservation (NYSDEC) for a state facility air permit for the emissions associated with the proposed installation of a robotically operated paint booth. A Public Participation Plan has been developed in accordance with NYSDEC Commissioner Policy 29, Environmental Justice and Permitting (CP-29). The purpose of this meeting is to inform the public about the project and to engage and involve the community early on in the state facility air permit application review process.

To Join Online

Click the following link:

<https://us05web.zoom.us/j/84801722079?pwd=JZpW5uUGyS4FKJoPnaJmlf7W7ysT93.1>

Meeting ID: 848 0172 2079

Password: 961331

To Call-in Using a Phone

Dial in using the following number:

(929) 205-6099

When prompted, enter the Meeting ID:

848 0172 2079

Agenda:

- Project Overview
- Background
- Scope of work
- Project schedules
- Community Impacts
- Proposed Mitigation Measures
- Questions and Answers

Your Attendance is Important!

Project personnel will be available to answer questions from the community. For additional information on the proposed project:

- Contact: Richard Harrington by phone at (315) 363-7680 ext. 258 or by email at rharrington@oneidamoldedplastics.com.
- Visit the repository at: www.oneidamoldedplastics.com

Contact the project liaison to request reasonable accommodation for a disability or interpreter services in a language other than English, so that you can participate in the call and/or to request a translation of any of the event documents into a language other than English.

APPENDIX C

Fact Sheet

Air Permit Modification Fact Sheet

- **Project:** Installation of a Robotically Operated Paint Booth
- **Applicant:** Oneida Molded Plastics
- **Facility:** 104 South Warner Street, Oneida, New York 13421
- **NYSDEC Application Number:** 7-2512-00017/00025
- **A Public Participation Plan (PPP) has been developed in accordance with NYSDEC Commissioner Policy 29, Environmental Justice and Permitting (CP-29)**

What is the Proposed Project?

The applicant proposes to install and operate a robotically operated paint booth as part of the facility's overall spray painting activities. To implement the proposed project, the applicant has submitted an application to the New York State Department of Environmental Conservation (NYSDEC) for a state facility air permit to regulate air emissions associated with the proposed new paint booth, as well as the currently existing seven (7) paint booths and Pozzi hydrographic dip system. The purpose of this fact sheet is to inform the public about this proposed project and to involve the community during the NYSDEC permit application review process.

Why does Oneida Molded Plastics need to install and operate the proposed robotic paint booth?

Currently the OMP facility has an Air Facility Registration with NYSDEC for the potential to emit volatile organic compounds (VOCs) from the facility's seven (7) manually applied paint booths and a Pozzi hydrographic dip system. Due to changes in the state's air regulations specific to applied coating activities (6 NYCRR 228), OMP and NYSDEC commenced a collaborative permit review process, and as a result, OMP applied for a New York State Facility Air Permit to continue covering OMP's current base manufacturing operations, as well as the proposed installation of a new robotically operated paint booth to meet increased customer demands.

OMP manufactures plastic parts. Specifically, OMP is a custom injection molding and decorating company located at 104 South Warner Street, in Oneida NY.

The company has been at this location for several decades. OMP currently provides jobs for approximately 170 people living in Oneida area. The facility operates 24 hours a day, 5 days a week with the capability of operating 24 hours a day, 7 days a week depending on the manufacturing workload to satisfy customers' needs.

One of the many decorative processes OMP provides to its customers is the ability to paint plastic molded parts. This process requires a highly skilled workforce. Currently the painting process is applied to the parts with a paint operator using a handheld spray gun.

OMP is experiencing challenges not being able to satisfy customers production requirements. This is caused by the number of parts the painters can paint by hand within a 24-hour time frame and the lack of labor force in the area to train to paint these parts. Not being able to satisfy customers needs in a timely manner has a negative impact on our company's future growth and the ability to provide more jobs for residents in the area.

To increase production capability, OMP decided to purchase a painting robot. The robot doesn't require a highly skilled painter to operate it. Because any of our operators can load and unload the parts to be painted, the robot does not eliminate operating labor.

Realizing the limiting factors to be able to paint more parts, OMP decided to purchase a robotically operated paint booth, which will increase production capacity, as well as create additional jobs.

How might the project affect the surrounding community?

The calculated worst case facility wide VOC emissions for this project is approximately 11 tons per year, which is significantly less than current levels (~20-24 tons per year). This is due to better overspray efficiencies and improved coating formulations (less VOC content). Specifically, the robotically operated paint booth uses approximately 29% less paint per painted part versus manually operated painting activities, thus generating less potentially harmful chemicals (volatile organic compounds and hazardous air pollutants) released into the air.

Furthermore, air dispersion modeling for the painting activities at the facility shows that the emissions for all specific VOC compounds identified in the coating formulations are well below the state and federal ambient air quality impact concentration guidelines (both short term and annual basis). These guideline concentration thresholds are based on published adverse health impact studies and data.

Finally, it is not anticipated that there will be an increase in delivery truck traffic and associated mobile air emissions from these diesel trucks with the anticipated increase in production activities from the proposed project.

On a positive note, the installation of the proposed robotically operated paint booth would not eliminate jobs. Painting with the robot would require approximately seven (7) additional full-time employees for paint mixing, material handling, quality inspection, etc.

Operating the robot does not require a skilled person to paint parts. The robot requires an operator with minimal training to load and unload the parts from the robotically operated paint booth.

The painting robot eliminates operator fatigue, the potential repetitive motion injuries, and downtime for not having skilled labor to paint parts.

The robot provides consistent painted part quality and productivity.

Painting with the robot increases daily productivity to satisfy our customer requirements. This results in company growth and opportunity for more jobs in our other manufacturing departments that support the robot.

How can I participate in the permit review process?

- Attend the upcoming virtual public meeting scheduled for June 24, 2025 at 6:00 pm to learn about the project, ask questions and/or express concerns about the project.
- Ask questions, express concerns, provide input or submit by comments in writing, by phone or email to the project contact person identified below.

Where can I get more information about the proposed project?

- Visit the online document repository at: www.oneidamoldedplastics.com to obtain application materials, relevant documents, and information about the project.
- Contact Richard Harrington by phone at: [(315) 363-7680 ext. 258, by email at: rharrington@oneidamoldedplastics.com or in writing at: 104 South Warner Street, Oneida, New York 13421 for information on the project, instructions on how to attend the upcoming virtual public meeting, or to find out about the status of the permit application and public comment period.

Who is responsible for reviewing the Permit Application?

- NYSDEC Region 7 Headquarters, 5785 Widewaters Parkway, Syracuse, New York 13214 is responsible for reviewing and issuing the required permits. Tel: (315) 426-7438; email: DEP.R7@dec.ny.gov.