

New York State Department of Environmental Conservation
Facility DEC ID: 1282201225



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 1-2822-01225/00001
Effective Date: 10/08/2002 Expiration Date: No expiration date

Permit Issued To: AIRCRAFT PROTECTIVE SERVICES INC
88 URBAN AVENUE
WESTBURY, NY 11590

Contact: LEONARD GROSS
88 URBAN AVENUE
WESTBURY, NY 11590
(516) 997-3072

Facility: AIRCRAFT PROTECTIVE SERVICES INC
88 URBAN AVE
WESTBURY, NY 11590

Contact: WILLIAM STRONG
88 URBAN AVENUE
WESTBURY, NY 11590
(516) 997-3072

Description:

Aircraft Protective Services Inc. is involved in chromium and sulfuric acid anodizing and spray coating of aerospace aluminum and steel parts. The 2 Emission Units of the facility consist of coating in spray booths and drying of coated parts in an oven, and cleaning and anodizing of aluminum and steel parts in chromium and sulfuric acid baths. The spray coating and drying unit consists of 3 Emission Points which are associated with 2 spray booths and one drying oven. The cleaning and anodizing unit consists of 2 Emission Points which are associated with emissions from chromic and sulfuric acid anodizing tanks. The spray coating and drying operations are subject to 6 NYCRR Part 228 (Surface Coating Processes) and 6 NYCRR Part 212 (General Process Emission Sources) regulations that require the utilization of compliant paints and emissions of toxics below the acceptable concentrations into the atmosphere. Emissions from the chromic acid anodizing tank are regulated under 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) and testing for these emissions is required shortly after the issuance of the State Facility Permit. Emissions from the sulfuric acid anodizing tank are regulated by 6 NYCRR Part 212 (General Process Emission Sources).

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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: ROGER EVANS
 DIVISION OF ENVIRONMENTAL PERMITS
 SUNY CAMPUS, LOOP ROAD, BUILDING 40
 STONY BROOK, NY 11790-2356

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 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 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 and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal-REGION 1

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 and Modifications
Applicable State Requirement: 6NYCRR 621.13

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



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transfer of ownership.

Condition 4: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

The Department reserves the right 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 Applications for Permit Modification or Renewal-REGION 1 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 1 Headquarters
Division of Environmental Permits

us, Loop Road, Building 40

Stony Brook, NY 11790-2356
(631) 444-0365



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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: AIRCRAFT PROTECTIVE SERVICES INC
88 URBAN AVENUE
WESTBURY, NY 11590

Facility: AIRCRAFT PROTECTIVE SERVICES INC
88 URBAN AVE
WESTBURY, NY 11590

Authorized Activity By Standard Industrial Classification Code:
3471 -

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LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

1 6NYCRR 228.10: Compliance Demonstration

Emission Unit Level

EU=1-PAINT,Proc=SPO

- 3 6NYCRR 212.4(c): Compliance Demonstration
- 4 6NYCRR 212.4(c): Compliance Demonstration
- 2 6NYCRR 212.9(b): Compliance Demonstration
- 6 6NYCRR 228.3(a): Compliance Demonstration
- 5 6NYCRR 228.4: Compliance Demonstration
- 7 6NYCRR 228.5(a): Compliance Demonstration

EU=2-ANODZ,Proc=ANO,ES=CANOD

- 10 40CFR 63.340(b), Subpart N: Compliance Demonstration
- 12 40CFR 63.342(f), Subpart N: Compliance Demonstration
- 8 40CFR 63.346(a), Subpart N: Compliance Demonstration
- 11 40CFR 63.346(b), Subpart N: Compliance Demonstration
- 9 40CFR 63.347(a), Subpart N: Compliance Demonstration
- 13 40CFR 63.347(h), Subpart N: Compliance Demonstration
- 14 40CFR 63.347(h)(2), Subpart N: Compliance Demonstration

EU=2-ANODZ,EP=00004,Proc=ANO,ES=CANOD

- 15 40CFR 63.342(d)(1), Subpart N: Compliance Demonstration

EU=2-ANODZ,EP=00005,Proc=ANO,ES=SANOD

- 16 6NYCRR 212.9(b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 17 ECL 19-0301: Contaminant List
- 18 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 19 6NYCRR 201-5: Emission Unit Definition
- 20 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 21 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 22 6NYCRR 201-5: Process Definition By Emission Unit

**ELECTROPLATING,POLISHING,ANODIZING, AND COLORING
3479 - METAL COATING AND ALLIED SERVICES,NEC**

Permit Effective Date: 10/08/2002

Permit Expiration Date: No expiration date.



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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

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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 - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR 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 - 6NYCRR Part 201-1.5

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event

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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 - 6NYCRR Part 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 - 6NYCRR Part 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 Part 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 Part 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



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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 Part 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 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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.

Item L: Open Fires - 6 NYCRR Part 215

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Item M: 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



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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 N: 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.

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 1.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0

VOC

Item 1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No owner or operator of a facility subject to 6NYCRR Part 228 shall:

- 1. Use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used

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for surface preparation, cleanup, or coating removal.

2. Store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup, or coating removal.

3. Use VOC and/or solvents to cleanup spray equipment unless the equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.

4. Use open containers to store or dispose surface coating and/or inks unless production, sampling, maintenance, or inspection procedures require operational access. The provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate.

5. Use open containers to store or dispose of spent surface coatings, spent VOC and/or solvents,

6. The facility shall be inspected daily to determine if there are any open containers. Open containers, if found, shall be covered. Annual certification of this work

practice is required.

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

****** Emission Unit Level ******

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Process: SPO

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Regulated Contaminant(s):

CAS No: 0NY075-00-0

PARTICULATES

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owner/operator of paint spray booths must periodically inspect the booths and the accompanying particulate control device(s) and record the inspections. Complete the following tasks on a weekly basis.

1. Inspect the spray booth's emission point for evidence of paint fallout and for presence of visible emissions. Presence of visible emissions indicates that the emission source may not be properly operating and that it may need servicing.
2. Inspect and replace the spray booth's particulate control device (filter) according to the manufacturer's specifications.
3. Inspect and maintain the spray guns regularly as per manufacturer's recommendations.
4. Record in an inspection log the date, name of individual performing inspection, and the inspection results after each inspection. Record the problem when discovered, the cause of the problem, and the corrective action taken to resolve the problem. The record log will be made available to the Department for review upon request.

The problems must be immediately remedied. The dates of control device (filter) replacements, methods of manufacturer's recommendations used for this replacement, and a summary of the spray booth's maintenance log will be reported to the Department.

Monitoring Frequency: WEEKLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

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Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Process: SPO

Regulated Contaminant(s):

CAS No: 0NY075-00-0

PARTICULATES

Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

1. Emissions of particulates from spray booths are limited to less than 0.05 grains per dry cubic foot of exhaust gas at standard conditions.
2. 95 percent or better particulate removal efficiencies shall be maintained in spray booths.
3. Compliance shall be based on monitoring the spray booths operational parameters, such as pressure drop across one or more filters, which justify the emission standard.
4. Performance testing to determine the parameter baseline or trigger value shall be conducted at the discretion of the Department.
5. All values of baseline parameters over any 3-hour period that average more than 30 percent of average levels maintained to demonstrate compliance shall be reported to the Department by a letter within seven (7) days and included in facility compliance reporting.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.9(b)

Item 2.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Process: SPO

Regulated Contaminant(s):

CAS No: 007789-06-2

STRONTIUM CHROMATE

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

Coating/solvent usage records and particulate filters on spray booths will be maintained and emission factors or test methods employed which demonstrate that the strontium chromate emissions are kept below 10 pounds per year. Strontium chromate is a highly toxic compound and is thus assigned the environmental rating A. Its emission rate needs to be limited in order to avoid the installation of best available control technology.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: PAINT

Parameter Monitored: STRONTIUM CHROMATE

Upper Permit Limit: 10 pounds per year

Reference Test Method: EPA Method 301

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: ARITHMETIC MEAN

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(a)

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Process: SPO

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No coatings are allowed that exceed the allowable limits as specified in Table 1 and Table 2 of Part 228.7 and 228.8. Only compliant coatings are allowed, unless approved by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Process: SPO

Item 5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:



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1. No person shall cause or allow emissions to the outdoor atmosphere having an opacity greater than 20 percent for any consecutive six-minute period from any emission point.
2. Compliance shall be based on monitoring the spray booths' operational parameters, such as pressure drop across the filters, which justify the emission standard.
3. Performance testing to determine the parameter baseline or trigger value shall be conducted at the discretion of the Department.
4. All values of baseline parameters over any 3-hour period that average more than 30 percent of average levels maintained to demonstrate compliance shall be reported by a letter within seven (7) days and included in facility compliance reporting.
5. The Department reserves the right to perform or require the performance of Method 9 opacity evaluation.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Process: SPO

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

1. Certifications from the coating supplier/manufacturer which verify the parameters used to determine the actual VOC content of paints in all spray booths must be maintained and upon request made available to the Department.
2. Purchase and usage records of coatings, including solvents, shall be maintained at the facility for a period of 5 years.
3. Reporting of certification is required.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Appl40CFR 63.340(b), Subpart N

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ANODZ

Emission Source: CANOD

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners/operators of affected sources subject to 40CFR63 Subpart N must comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Table 1 of Subpart N. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Appli40CFR 63.342(f), Subpart N

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ANODZ

Emission Source: CANOD

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

1. The owner/operator shall operate and maintain the affected source in a manner consistent with good air pollution control practices at all times (including during startup, shutdown, and malfunctions). Malfunctions shall be corrected as soon as practicable. Operation and maintenance requirements established under section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
2. The determination of whether the operation and maintenance procedures are acceptable will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source. Based on the results of this determination, the Administrator may require that the operation and maintenance plan be revised. Revisions may be required if it is found that the plan does not (a) address a malfunction that has occurred, (b) provide for the operation of the affected source, the air pollution techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices, or (c) provide adequate procedures for correcting malfunctioning process equipment, air pollution

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control techniques, or monitoring equipment as quickly as practicable.

3. The owner/operator shall prepare an operation and maintenance (O&M) plan to be implemented no later than the compliance date. The plan shall include the information found in 40CFR63.342(f)(3)(i) (A) through (E).

If the O&M plan fails to address an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner/operator shall revise the O&M plan within 45 days to include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunctions, and a program for corrective actions taken for such events.

If actions taken by the owner/operator during periods of malfunction are inconsistent with the O&M plan, the actions taken shall be recorded and reported by phone within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event.

The owner/operator shall keep the written O&M plan on record to be available for inspection by the Administrator until the source is no longer subject to Subpart N. In addition, if the O&M plan is revised, previous versions shall be kept available for a period of 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Appl40CFR 63.346(a), Subpart N

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ANODZ



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Emission Source: CANOD

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of the chrome anodizer source subject to 40CFR63 Subpart N shall fulfill all recordkeeping requirements outlined in section 40CFR63.346 and in the General Provisions of 40CFR63 Subpart A.

The records specified for Subpart N are listed in items numbered 1 through 16 in section 40CFR63.346(b). Subpart A requirements are specified in Table 1 of Subpart N. All records shall be maintained for a period of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The data may be maintained on microfilm, in a computer, or on other storage media. Reports shall be submitted to the

regional office of DEC.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Appl40CFR 63.346(b), Subpart N

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ANODZ

Emission Source: CANOD

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of the chromium anodizer tank subject to the provisions of 40CFR63.342(d)(1) (not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.01 mg/dscm) shall maintain the following records for such a source:

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1. Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment.
2. Records of the occurrence, duration, and cause of each malfunction of process, add-on air pollution control, and monitoring equipment.
3. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
4. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 40CFR63.342(f)(3).
5. Records of monitoring data required by 40CFR63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
6. The specific identification (i.e. the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment.
7. The specific identification (i.e. the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment.
8. The total process operating time of the affected source during the reporting period.
9. For sources using fume suppressants to comply with the standards, records of the date and time that fume suppressants are added to the electroplating or anodizing tank.
10. All documentation supporting the notification and reports required by 40CFR63.9, 40CFR63.10, and 40CFR63.347.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Appl40CFR 63.347(a), Subpart N

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ANODZ

Emission Source: CANOD

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of each affected source subject to 40CFR63 Subpart N shall fulfill all reporting requirements as outlined in section 40CFR63.347 and in the General Provisions of 40CFR63. General Provisions requirements are identified in Table 1 of Subpart N.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Appl40CFR 63.347(h), Subpart N

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ANODZ

Emission Source: CANOD

Item 13.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of the affected source that is located at an area source site shall submit a summary report to document the ongoing compliance status of the affected source. The report shall contain the information identified below and shall be submitted annually, except as provided in paragraph 40CFR63.347(h)(2).

1. The company name and address of the affected source.
2. An identification of the operating parameter that is being monitored for compliance determination, as required by 40CFR63.343(c).
3. The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by 40CFR63.347(e).
4. The beginning and ending dates of the reporting period.
5. A description of the type of process performed in the affected source.
6. The total operating time of the affected source during the reporting period.
7. If the affected source is a hard chromium electroplating tank and the owner or operator is limiting the maximum cumulative rectifier capacity in accordance with 40CFR63.342(c)(2), the actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis.
8. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during the reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunction, other known causes, and unknown causes.

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9. A certification by a responsible official, as defined in 40CFR63.2, that the work practice standards in 40CFR63.342(f) were followed in accordance with the operation and maintenance plan for the source.

10. If the operation and maintenance plan required by 40CFR63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40CFR63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed.

11. A description of any changes in monitoring, processes, or control since the last reporting period.

12. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

13. The date of the report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Compliance Demonstration

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.347(h)(2), Subpart N

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ANODZ

Emission Source: CANOD

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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Sulfuric acid is a toxic compound and its emission rate potential for this emission point (before control) was estimated to be 0.2 pounds per hour. The polypropylene balls floating on the surface of the tank are estimated to control about 50% of these emissions. With this control the emissions are below the ambient guideline concentration listed in guidance document DAR-1 and it is not necessary to install the best available control technology to control the emissions.

If inspections offer reasons to doubt that the sulfuric acid emissions exceed the allowable concentration, the Department may request a performance test pursuant of 6NYCRR Part 202-1. The test must show that the actual emission rate is less than 0.1 pounds per hour.

Parameter Monitored: SULFURIC ACID

Upper Permit Limit: 0.10 pounds per hour

Reference Test Method: EPA Method 8

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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



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 - 6NYCRR Part 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 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 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

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law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 17: Contaminant List
Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 17.1:

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

CAS No: 007440-47-3

Name: CHROMIUM

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007789-06-2
TRONTIUM CHROMATE

CAS No: 007664-93-9
Name: SULFURIC ACID

CAS No: 0NY998-00-0

Name: VOC

Condition 18: Unavoidable noncompliance and violations
Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 18.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

- (a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued



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for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air taminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner., shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Emission Unit Definition

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 19.1:

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

Emission Unit: 1-PAINT

Emission Unit Description:

The Emission Unit consists of two spray booths where the metal parts are coated with compliant paints, and one curing oven where the parts are dried. The emissions from spray booths and curing oven are vented through three



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emission points. Emissions from the paint storage room are exempted under 6NYCRR Part 201-3.2(c)(42) because the paints stored at this location are kept in closed containers.

Building(s): HDQ

Item 19.2:

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

Emission Unit: 2-ANODZ

Emission Unit Description:

The Emission Unit consists of alkaline cleaning, etching, deoxidizing, and anodizing processes. The emissions from chromic acid bath are controlled by a composite mesh pad scrubber prior of being vented through the Emission Point 4. Emissions from the sulfuric acid bath are vented through the Emission Point 5.

Building(s): HDQ

Air pollution prohibited

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 20.1:

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 nation with others.

****** Emission Unit Level ******

Condition 21: Emission Point Definition By Emission Unit

Effective between the dates of 10/08/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 21.1:

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

Emission Unit: 1-PAINT



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Emission Point: 00001
Height (ft.): 22
NYTMN (km.): 4514.1
Diameter (in.): 24
NYTME (km.): 621.
Building: HDQ

Emission Point: 00002
Height (ft.): 22
NYTMN (km.): 4514.1
Diameter (in.): 24
NYTME (km.): 621.
Building: HDQ

Emission Point: 00003
Height (ft.): 22
NYTMN (km.): 4514.1
Diameter (in.): 12
NYTME (km.): 621.
Building: HDQ

Item 21.2:

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

Emission Unit: 2-ANODZ

Emission Point: 00004
Height (ft.): 19
NYTMN (km.): 4514.1
Diameter (in.): 15
NYTME (km.): 621.
Building: HDQ

Emission Point: 00005
Height (ft.): 18
NYTMN (km.): 4514.1
Diameter (in.): 12
NYTME (km.): 621.
Building: HDQ

**Condition 22: Process Definition By Emission Unit
Effective between the dates of 10/08/2002 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 201-5

Item 22.1:

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

Emission Unit: 1-PAINT

Process: SPO

Source Classification Code: 4-02-025-01

Process Description:

Compliant coatings are applied to metal parts in two spray booths and the parts are dried in a curing oven. The paints are stored in closed containers.

Emission Source/Control: PSB01 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSB02 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSOV1 - Process

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Item 22.2:

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

Emission Unit: 2-ANODZ

Process: ANO

Source Classification Code: 3-09-011-03

Process Description:

The metal parts are cleaned in an alkaline solution at 150 F. After rinsing at ambient temperature, the parts are etched at 140 F, dioxidized at 70 F, and rinsed. After inspection the parts are either anodized or chemically filmed. The anodized parts are resealed and the filmed parts are rinsed. Some parts are subsequently masked, primed, and/or topcoated. All parts are then inspected, packed, and shipped to customers. The emissions from chromic and sulfuric acid anodizing baths are vented into the atmosphere through emission points 4 and 5.

Emission Source/Control:

CANOD - Control

Control Type: MIST ELIMINATOR

Emission Source/Control:

SANOD - Process