

New York State Department of Environmental Conservation
Facility DEC ID: 2610100369



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 2-6101-00369/00001
Mod 0 Effective Date: 01/08/2002 Expiration Date: No expiration date.
Mod 1 Effective Date: 10/28/2004 Expiration Date: No expiration date.

Permit Issued To: GMD SHIPYARD CORP
BROOKLYN NAVY YARD
BLDG 595
BROOKLYN, NY 11205

Contact: MICHAEL CRANSTON
GMD SHIPYARD
BROOKLYN NAVY YARD BLDG 595
BROOKLYN, NY 11205
(718) 260-9200

Facility: G M D SHIPYARD - BROOKLYN NAVY YARD
BROOKLYN NAVY YARD BLDG 595
BROOKLYN, NY 11205

Description:
THE GMD SHIPYARD IS AN EXISTING SHIP REPAIR AND SURFACE COATING FACILITY. THIS APPLICATION IS INTENDED TO INCORPORATE THE USE OF DRY DOCK #1 INTO THE BROOKLYN NAVY YARD OPERATION. THE DRY DOCKS # 1, 3, 5, AND 6 ARE USED INTERCHANGEABLY FOR ALL SHIP REPAIR ACTIVITIES AND SURFACE COATING OPERATIONS. THIS CHANGE DO NOT CAUSE EMISSIONS TO EXCEED THE AIR STATE FACILITY EMISSION LIMITATION.

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 part of this permit.

Permit Administrator: JOHN F CRYAN
DIVISION OF ENVIRONMENTAL PERMITS
ONE HUNTERS POINT PLAZA, 47-40 21ST STREET
LONG ISLAND CITY, NY 11101-5407

Authorized Signature: _____ Date: ___ / ___ / ____

New York State Department of Environmental Conservation

ID: 2610100369



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

on not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal-REGION 2

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 1-1: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6NYCRR 621.13

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:

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

New York State Department of Environmental Conservation



Permit ID: 2610100369

transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 1

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.

Condition 1-2: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 1-2.1:

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.

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

Expired by Mod No: 1

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

New York State Department of Environmental Conservation
Facility DEC ID: 2610100369



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

**Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 2
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 2 Headquarters

Division of Environmental Permits
1 Hunters Point Plaza, 4740 21st Street

land City, NY 11101-5407

(718) 482-4997



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: GMD SHIPYARD CORP
BROOKLYN NAVY YARD
BLDG 595
BROOKLYN, NY 11205

ARD - BROOKLYN NAVY YARD

BROOKLYN NAVY YARD BLDG 595
BROOKLYN, NY 11205

Authorized Activity By Standard Industrial Classification Code:
3731 - SHIP BUILDING AND REPAIRING

Mod 0 Permit Effective Date: 01/08/2002



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 15 6NYCRR 228.5(a): Compliance Demonstration
- 16 40CFR 63.10, Subpart A: § 63.10(b) General Recordkeeping Requirements
- 17 40CFR 63.10, Subpart A: §63.10(d) General Reporting Requirements
- 1-1 40CFR 63.788, Subpart II: Compliance Demonstration

Emission Unit Level

EU=U-SC001

- 25 6NYCRR 212.3(a): Emissions from existing sources
- 26 6NYCRR 212.3(b): Existing sources - 212.3(b) particulate matter standard.
- 27 6NYCRR 228.3(a): Volatile organic compound emission control requirements
- 28 6NYCRR 228.7: Compliance Demonstration
- 29 6NYCRR 228.7: Compliance Demonstration
- 30 40CFR 63.783, Subpart II: §63.783(a) - Standards for Coatings Using an Alternative Test Method
- 31 40CFR 63.788, Subpart II: §63.788 - Recordkeeping and Reporting

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 1-2 ECL 19-0301: Contaminant List
- 41 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 44 6NYCRR 201-5: Emission Unit Definition
- 1-3 6NYCRR 201-7.2: Facility Permissible Emissions
- *1-4 6NYCRR 201-7.2: Capping Monitoring Condition
- 46 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 47 6NYCRR 201-5: Process Definition By Emission Unit
- 1-5 6NYCRR 201-7.2: Emission Unit Permissible Emissions
- 1-6 6NYCRR 201-7.2: Process Permissible Emissions

EU=U-SC001,Proc=001

- *1-7 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-8 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-9 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-10 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-11 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-12 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-13 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-14 6NYCRR 201-7.2: Capping Monitoring Condition

NOTE: * preceding the condition number indicates capping. Permit Expiration Date: No expiration date.

New York State Department of Environmental Conservation
Facility DEC ID: 2610100369



Mod 1 Permit Effective Date: 10/28/2004

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



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



New York State Department of Environmental Conservation
Facility DEC ID: 2610100369

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



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

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

New York State Department of Environmental Conservation
Facility DEC ID: 2610100369



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.

Condition 15: Compliance Demonstration
Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 15.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 15.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

department. Records must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: § 63.10(b) General Recordkeeping Requirements
Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 16.1:

The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum the most recent 2 years of data shall be retained on site. The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source as described in 40 CFR 63.10 (b)(2).

Condition 17: §63.10(d) General Reporting Requirements
Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 17.1:

The owner or operator of an affected source subject to the reporting requirements under the general provisions shall submit reports to the Department in accordance with the reporting requirements in the relevant standards as described in 40 CFR 63.10 (d).

Condition 1-1: Compliance Demonstration
Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.788, Subpart II

Item 1-1.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

New York State Department of Environmental Conservation
Facility DEC ID: 2610100369



USE OF COATINGS & THINNERS WILL BE
O THOSE WHICH CONFORM TO
VOHAP LIMITS SET FORTH IN 40CFR 63-II.788
TABLE 2 TO DEMONSTRATE COMPLIANCE.
L MAINTAIN PAINT & THINNER
USAGE RECORDS CONSISTENT WITH PROCEDURES
CONTAINED IN THIS REGULATION. ATTACHMENT
2.

Reference Test Method: EPA METH 24
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 25: Emissions from existing sources
Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 25.1:

This Condition applies to Emission Unit: U-SC001

Item 25.2:

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 26: Existing sources - 212.3(b) particulate matter standard.
Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.3(b)

Item 26.1:

This Condition applies to Emission Unit: U-SC001

Item 26.2:

In instances where determination of permissible emission rate using process weight is not applicable (see Table 5 of Part 212) and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.15 grains of particulates per cubic foot of exhaust gas, corrected for dilution air and expressed at standard conditions on a dry gas basis.

Condition 27: Volatile organic compound emission control requirements
Effective between the dates of 01/08/2002 and Permit Expiration Date



New York State Department of Environmental Conservation
Facility DEC ID: 2610100369

Applicable Federal Requirement: 6NYCRR 228.3(a)

Item 27.1:

This Condition applies to Emission Unit: U-SC001

Item 27.2:

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2 of Part 228, unless an approved coating system or approved control equipment is utilized or a variance has been granted.

In the absence of an approved coating system, approved control equipment or a variance, surface coating of only those materials specified in conditions of this permit citing Tables 1 and 2 in Sections 228.7 and 228.8 shall be allowed.

Condition 28: Compliance Demonstration
Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Air-dried and forced warm-air dried coatings used for the surface coating of miscellaneous metal parts and products may contain a maximum of 3.5 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: AIR DRIED/FORCED WARM AIR-DRIED COATING - MISCELLANEOUS METAL PARTS

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Method: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 29: Compliance Demonstration

Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

Clear coats used for the surface coating of miscellaneous
metal parts and products may contain a maximum of 4.3
pounds of volatile organic compounds per gallon of coating
(minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: CLEAR COATINGS - MISCELLANEOUS METAL PARTS

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 4.3 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

: SINGLE OCCURRENCE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 30: §63.783(a) - Standards for Coatings Using an Alternative
Test Method**

Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.783, Subpart II

Item 30.1:

This Condition applies to Emission Unit: U-SC001

New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369



Item 30.2:

No owner or operator of any existing or new affected source shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit in Table 2 of 40 CFR 63.780 as determined by the procedures described in §63.785(c)(1) through (c)(4). For the compliance procedure described in §63.785(c)(4), an alternative test method capable of measuring independent VOHAP shall be used to determine compliance. The method must be submitted to and approved by the Administrator.

88 - Recordkeeping and Reporting

Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.788, Subpart II

Item 31.1:

This Condition applies to Emission Unit: U-SC001

Item 31.2:

Each owner or operator of and affected source shall comply with the applicable recordkeeping and reporting requirements in §63.10(a), (d), and (f). A summary of recordkeeping and reporting requirements is provided in Table 3 of 40 CFR 63.780 Subpart II.



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



law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 1-2: Contaminant List
Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 1-2.1:

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

CAS No: 000108-10-1
Name: 2-PENTANONE, 4-METHYL

CAS No: 000107-98-2
Name: 2-PROPANOL, 1-METHOXY

CAS No: 000108-65-6
Name: 2-PROPANOL, 1-METHOXY-, ACETATE

CAS No: 000100-41-4
Name: ETHYLBENZENE

CAS No: 0NY100-00-0
Name: HAP

CAS No: 000067-56-1
Name: METHYL ALCOHOL

CAS No: 0NY998-00-0
Name: VOC

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

able noncompliance and violations

Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 41.1:



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

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 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 contaminants 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.

Condition 44: Emission Unit Definition
Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369



Item 44.1(From Mod 1):

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

Emission Unit: U-SC001

Emission Unit Description:

KNOS. 1, 3, 5, AND 6 ARE USED

INTERCHANGEABLY FOR ALL SHIP REPAIR AND COATING OPERATIONS. BECAUSE OF THIS AND

ANCE WILL BE CONTINUALLY

DEMONSTRATED VIA PAINT AND THINNER USAGE RECORDS, THESE FOUR DRY DOCKS ARE TREATED

EMISSION UNIT. AS SUCH, THE

DESIGN CAPACITY ENTRY IN THE EMISSION SOURCE/CONTROL SECTION REPRESENTS THE TOTAL ESTIMATED FACILITY SURFACE COATING CAPACITY (ANNUAL) BASED ON 24 MONTHS OF AVAILABLE

FACE COATING DATA, TIMES A

1.33 UTILIZATION FACTOR TO ACCOMMODATE FUTURE GROWTH.

Building(s): 1
2
3

Condition 1-3: Facility Permissible Emissions

Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-3.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000067-56-1 (From Mod 1) PTE: 0.9 pounds per year
Name: METHYL ALCOHOL

CAS No: 000100-41-4 (From Mod 1) PTE: 467.2 pounds per year
Name: ETHYLBENZENE

CAS No: 000107-98-2 (From Mod 1) PTE: 59.5 pounds per year
Name: 2-PROPANOL, 1-METHOXY

CAS No: 000108-10-1 (From Mod 1) PTE: 0.9 pounds per year
Name: 2-PENTANONE, 4-METHYL



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

CAS No: 000108-65-6 (From Mod 1) PTE: 1,692.6 pounds per year
Name: 2-PROPANOL, 1-METHOXY-, ACETATE

CAS No: 0PTE: 15,567.1 pounds per year
Name: XYLENE, M, O & P MIXT.

CAS No: 0NY100-00-0 (From Mod 1) PTE: 17,788.2 pounds per year
Name: HAP

CAS No: 0NY998-00-0 (From Mod 1) PTE: 45,765 pounds per year
Name: VOC

Condition 1-4: Capping Monitoring Condition
Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-4.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-4.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-4.3:

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 regulations or law.

Item 1-4.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-4.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-4.6:



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 1-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PAINTS & THINNERS WILL BE

RESTRICTED TO THOSE WHICH CONFORM TO
VOHAP LIMITS SET FORTH IN 40CFR 63-II.788

TO DEMONSTRATE COMPLIANCE.

FACILITY WILL MAINTAIN PAINT & THINNER
USAGE RECORDS CONSISTENT WITH PROCEDURES

UNDER FEDERAL AND STATE REGULATIONS. ATTACHMENT

2.

Reference Test Method: EPA METH 24

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2005.

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

Condition 46: Air pollution prohibited

Effective between the dates of 01/08/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 46.1:

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

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

Process Definition By Emission Unit

Effective between the dates of 01/08/2002 and Permit Expiration Date

New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369



Applicable State Requirement: 6NYCRR 201-5

Item 47.1(From Mod 1):

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

Emission Unit: U-SC001

Process: 001

Source Classification Code: 4-02-001-01

Process Description:

SURFACE COATING REPRESENTS THE PROCESS

OF SURFACES IN EMISSIONS OF VOCS AND

HAPS. COATINGS ARE APPLIED TO SHIPS, IN THE OPEN ATMOSPHERE DURING DRY WEATHER, EITHER BY HAND (E.G., BRUSH, ROLLER) OR BY HAND-HELD PAINT-SPRAYING EQUIPMENT.

Emission Source/Control: 00001 - Process

Quantity: 14,109 gallons per year

Condition 1-5: Emission Unit Permissible Emissions

Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-5.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: U-SC001

CAS No: 000067561 (From Mod 1)

Name: METHYL ALCOHOL

PTE(s): 0.0001 pounds per hour

0.9 pounds per year

CAS No: 000107982 (From Mod 1)

Name: 2-PROPANOL, 1-METHOXY

PTE(s): 59.5 pounds per year

0.007 pounds per hour

CAS No: 000108101 (From Mod 1)

Name: 2-PENTANONE, 4-METHYL

PTE(s): 0.9 pounds per year

0.0001 pounds per hour

CAS No: 000108656 (From Mod 1)

Name: 2-PROPANOL, 1-METHOXY-, ACETATE

New York State Department of Environmental Conservation
Facility DEC ID: 2610100369



PTE(s): 1,692.6 pounds per year
0.193 pounds per hour

CAS No: 001330207 (From Mod 1)
Name: XYLENE, M, O & P MIXT.

PTE(s): 1.78 pounds per hour
15,567.1 pounds per year

CAS No: 0NY998000 (From Mod 1)
Name: VOC

PTE(s): 5.22 pounds per hour
45,765 pounds per year

CAS No: 0NY100000 (From Mod 1)
Name: HAP

PTE(s): 2.03 pounds per hour
17,788.2 pounds per year

Condition 1-6: Process Permissible Emissions
Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-6.1:

The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: U-SC001 Process: 001

CAS No: 000067-56-1 (From Mod 1)
Name: METHYL ALCOHOL

PTE(s): 0.0001 pounds per hour
0.9 pounds per year

CAS No: 000107-98-2 (From Mod 1)
Name: 2-PROPANOL, 1-METHOXY

PTE(s): 0.007 pounds per hour
59.5 pounds per year

CAS No: 000108-10-1 (From Mod 1)
Name: 2-PENTANONE, 4-METHYL

PTE(s): 0.0001 pounds per hour
0.9 pounds per year

CAS No: 000108-65-6 (From Mod 1)
Name: 2-PROPANOL, 1-METHOXY-, ACETATE



New York State Department of Environmental Conservation
Facility DEC ID: 2610100369

PTE(s): 0.193 pounds per hour
1,692.6 pounds per year

CAS No: 001330-20-7 (From Mod 1)
Name: XYLENE, M, O & P MIXT.
PTE(s): 1.78 pounds per hour
15,567.1 pounds per year

CAS No: 0NY998-00-0 (From Mod 1)
Name: VOC
PTE(s): 5.22 pounds per hour
45,765 pounds per year

CAS No: 0NY100-00-0 (From Mod 1)
Name: HAP
PTE(s): 2.03 pounds per hour
17,788.2 pounds per year

Condition 1-7: Capping Monitoring Condition
Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-7.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-7.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, and conditions in this permit.

Item 1-7.3:

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

Item 1-7.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369



Item 1-7.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-7.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001

Process: 001

Regulated Contaminant(s):

CAS No: 000067-56-1 METHYL ALCOHOL

Item 1-7.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

ANNUAL METHYL ALCOHOL EMISSIONS ARE LIMITED TO 0.9 POUNDS PER YEAR (SEE TABLE 4 OF ATTACHMENT 3 (CALCULATIONS)).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

red: METHYL ALCOHOL

Upper Permit Limit: 0.9 pounds per year

Reference Test Method: EPA METH 24

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-8: Capping Monitoring Condition

Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-8.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-8.2:



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-8.3:

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 regulations or law.

Item 1-8.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-8.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-8.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001

Process: 001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-8.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

ANNUAL VOC EMISSIONS ARE LIMITED TO 22.88 TONS PER YEAR (SEE TABLE 4 OF ATTACHMENT 3 (CALCULATIONS)).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Limit: 22.88 tons per year

Reference Test Method: EPA METH 24

Monitoring Frequency: MONTHLY



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-9: Capping Monitoring Condition

Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-9.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-9.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, and standards in this permit.

Item 1-9.3:

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

Item 1-9.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-9.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-9.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001

Process: 001

Regulated Contaminant(s):

CAS No: 001330-20-7 XYLENE, M, O & P MIXT.

Item 1-9.7:



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

THE EMISSIONS ARE LIMITED TO

7.78 TONS PER YEAR (SEE TABLE 4 OF ATTACHMENT 3 (CALCULATIONS)).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: XYLENE, M, O & P MIXT.

Upper Permit Limit: 7.78 tons per year

Reference Test Method: EPA METH 24

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-10: Capping Monitoring Condition

Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-10.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-10.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, and standards in this permit.

Item 1-10.3:

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

Item 1-10.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

threshold levels that would require compliance with an applicable requirement.

Item 1-10.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-10.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001
Process: 001

Regulated Contaminant(s):
CAS No: 000108-10-1 2-PENTANONE, 4-METHYL

Item 1-10.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
ANNUAL METHYL ISOBUTYL KETONE EMISSIONS
TO 0.9 POUNDS PER YEAR (SEE
TABLE 4 OF ATTACHMENT 3 (CALCULATIONS)).

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: 2-PENTANONE, 4-METHYL

Limit: 0.9 pounds per year

Reference Test Method: EPA METH 24
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-11: Capping Monitoring Condition

Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-11.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

Item 1-11.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, and conditions in this permit.

Item 1-11.3:

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

Item 1-11.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-11.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-11.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001
Process: 001

Regulated Contaminant(s):
CAS No: 000108-65-6 2-PROPANOL, 1-METHOXY-, ACETATE

Item 1-11.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:
ANNUAL PROPYLENE GLYCOL MONO METHYL
RATE LIMITED TO 0.85 TONS PER
YEAR (SEE TABLE 4 OF ATTACHMENT 3
(CALCULATIONS)).

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: 2-PROPANOL, 1-METHOXY-, ACETATE
Upper Permit Limit: 0.85 tons per year



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

Reference Test Method: EPA METH 24

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-12: Capping Monitoring Condition

Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-12.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-12.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, and conditions in this permit.

Item 1-12.3:

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

Item 1-12.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-12.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-12.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001

Process: 001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369



Item 1-12.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

ANNUAL HAP EMISSIONS ARE LIMITED TO 8.89

SEE TABLE 4 OF ATTACHMENT

3 (CALCULATIONS)).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: HAP

Upper Permit Limit: 8.89 tons per year

Reference Test Method: EPA METH 24

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-13: Capping Monitoring Condition

Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-13.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-13.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-13.3:

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

regulations or law.

Item 1-13.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has



New York State Department of Environmental Conservation

Permit ID: 2-6101-00369/00001

Facility DEC ID: 2610100369

operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-13.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-13.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001

Process: 001

Regulated Contaminant(s):

CAS No: 000100-41-4 ETHYLBENZENE

Item 1-13.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

ETHYLBENZENE EMISSIONS ARE

LIMITED TO 0.23 TONS PER YEAR (SEE TABLE 4 OF ATTACHMENT 3 (CALCULATIONS)).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ETHYLBENZENE

Upper Permit Limit: 0.23 tons per year

Reference Test Method: EPA METH 24

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-14: Capping Monitoring Condition

Effective between the dates of 10/28/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-14.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:



New York State Department of Environmental Conservation
Facility DEC ID: 2610100369

6NYCRR 201-6

Item 1-14.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-14.3:

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 regulations or law.

Item 1-14.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-14.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-14.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-SC001

Process: 001

Regulated Contaminant(s):

CAS No: 000107-98-2 2-PROPANOL, 1-METHOXY

Item 1-14.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

ANNUAL PROPYLENE GLYCOL METHYL ETHER EMISSIONS ARE LIMITED TO 0.03 TONS PER YEAR (SEE TABLE 4 OF ATTACHMENT 3 (CALCULATIONS)).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

New York State Department of Environmental Conservation
Facility DEC ID: 2610100369



ROPANOL, 1-METHOXY

Upper Permit Limit: 0.03 tons per year

Reference Test Method: EPA METH 24

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY