

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3352-00142/00025

Effective Date: 11/08/2013 Expiration Date: 11/07/2023

Permit Issued To:CHROMALLOY GAS TURBINE LLC

330 BLAISDELL RD ORANGEBURG, NY 10962

Facility: CHROMALLOY MIDDLETOWN

105 TOWER DR

MIDDLETOWN, NY 10941

Contact: LA MARR TAYLOR

CHROMALLOY MIDDLETOWN

105 TOWER DR

MIDDLETOWN, NY 10941

(845) 692-8912

Description:

This permit is for the operation of air emission sources assoicated with plasma spraying, acid cleaning, autoclave treatment, and part cutting processes at Chromalloy Middletown. The facility provides repair services for turbine combustor parts. The facility is subject to NYCRR Part 212 requirements which limit and control emissions of gas and particulates.

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

Permit Administrator:	GEORGE A SWEIKERT	
	NYSDEC	
	21 C DUTT CODNEDC DD	

21 S PUTT CORNERS RD NEW PALTZ, NY 12561-1696

Authorized Signature:	Date:	! /	



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department Relationship of this Permit to Other Department Orders and Determinations

Applications for permit renewals, modifications and transfers
Permit modifications, suspensions or revocations by the Department
Facility Level

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



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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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

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

Item 4.1:

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

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

**** Facility Level ****

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

Item 5.1:

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

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



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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY

PERMIT

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Facility: CHROMALLOY MIDDLETOWN

105 TOWER DR

MIDDLETOWN, NY 10941

Authorized Activity By Standard Industrial Classification Code: 3479 - METAL COATING AND ALLIED SERVICES,NEC

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LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

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- 1 6 NYCRR 200.7: Maintenance of Equipment
- 2 6 NYCRR 211.1: Air pollution prohibited
- 3 6 NYCRR 212.4 (c): Compliance Demonstration
- 4 6 NYCRR 212.6 (a): Compliance Demonstration
- 5 6 NYCRR 212.9 (b): Compliance Demonstration
- 6 40CFR 63, Subpart WWWWWW: Compliance Demonstration

Emission Unit Level

EU=U-00APS

- 7 6 NYCRR 212.9 (b): Compliance Demonstration
- 8 6 NYCRR 212.9 (b): Compliance Demonstration

EU=U-0LPPS

9 6 NYCRR 200.7: Compliance Demonstration

EU=U-0MISC,EP=00012,Proc=012,ES=0012A

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EU=U-0MISC,EP=00018,Proc=018,ES=0018A

11 6 NYCRR 212.9 (b): Compliance Demonstration

EU=U-0MISC,EP=00033,Proc=033,ES=0033A

12 6 NYCRR 212.9 (b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS Facility Level

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- 14 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 15 6 NYCRR Subpart 201-5: Emission Unit Definition
- 16 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 17 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 18 6 NYCRR 201-5.4 (e): Compliance Demonstration
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FEDERALLY ENFORCEABLE CONDITIONS **** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



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required to operate such device effectively.

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

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner and/or operator notified the

Department

within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



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

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

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

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

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

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

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

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

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

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



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

Item K: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item L: Permit Exclusion - ECL 19-0305

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS The following conditions are federally enforceable.

Condition 1: Maintenance of Equipment



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Applicable Federal Requirement: 6 NYCRR 200.7

Item 1.1:

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

Condition 2: Air pollution prohibited

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 6 NYCRR 211.1

Item 2.1:

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

Condition 3: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 3.1:

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

Emission Unit: U-0EVAP Emission Point: 00029

Emission Unit: U-0EVAP Emission Point: 00030

Emission Unit: U-0MISC Emission Point: 00005

Emission Unit: U-00VEN Emission Point: 00023

Emission Unit: U-00VEN Emission Point: 00028

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:



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Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted by the facility at the request of the Department.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.050 grains per dscf Reference Test Method: EPA Method 5

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 4: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The opacity limit applies to any emission point, identified in this permit, from which particulate matter is discharged.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 5: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 6 NYCRR 212.9 (b)



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Item 5.1:

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

Emission Unit: U-0LPPS Emission Point: 00013

Emission Unit: U-0LPPS Emission Point: 00021

Emission Unit: U-0LPPS Emission Point: 00026

Regulated Contaminant(s):

CAS No: 007440-02-0 NICKEL METAL AND INSOLUBLE

COMPOUNDS

CAS No: 007440-47-3 CHROMIUM CAS No: 0NY075-00-0 PARTICULATES

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A reduction in particulate emissions of at least 99 percent must be achieved for each of the emission points listed above. Emission testing and reporting will be conducted by the facility, if directed by the Department.

Parameter Monitored: PARTICULATES

Lower Permit Limit: 99 percent reduction by weight

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 6: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 40CFR 63, Subpart WWWWWW

Item 6.1:

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

Emission Unit: U-00APS

Process: APS

Emission Unit: U-0LPPS

Process: LPS

Item 6.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

For all thermal operations, a capture system must be operated which collects particulate emissions from the thermal spraying process, and transports the emissions to a filtering device. Emission capture and control devices must be operated according to the manufacturer's specifications and operating instructions. These instructions shall be kept at the facility at all times in a location that is easily accessible to facility personnel.

Compliance shall be documented in an annual certification of compliance report for each calendar year. The annual report must include a statement that the control devices have been operated and maintained according to manufacturer's specifications and instructions. The annual report must be submitted only if any deviations from this permit condition have occurred during the year. Then such report shall include an explanation of the deviation and the corrective action taken, and the report must be postmarked or delivered to the delegated authority no later than January 31 of the year immediately following the reporting period.

All reports and records must be kept by the facility for a minimum of 5 years, and must be made available upon request by regulatory personnel.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 7: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00APS

Regulated Contaminant(s):

CAS No: 007440-02-0 NICKEL METAL AND INSOLUBLE

COMPOUNDS

CAS No: 007440-47-3 CHROMIUM

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CAS No: 0NY075-00-0 PARTICULATES

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A reduction in particulate emissions of least 99 percent must be achieved by each set of cartridge filters for each air plasma spray emission point. Emission testing and reporting will be conducted by the facility, if directed by the Department.

Parameter Monitored: PARTICULATES

Lower Permit Limit: 99 percent reduction by weight

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00APS

Regulated Contaminant(s):

CAS No: 007440-02-0 NICKEL METAL AND INSOLUBLE

COMPOUNDS

CAS No: 007440-47-3 CHROMIUM CAS No: 0NY075-00-0 PARTICULATES

Item 8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A reduction in particulate emissions of at least 99 percent must be achieved for each of the HEPA filters associated with the air plasma spray process.

Monitoring of the differential pressure across the HEPA filter will be used to demonstrate compliance with this emission reduction limit. The differential pressure shall be read and recorded at least once per week. The pressure

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is limited to a maximum of 5.0 inches of water. If the pressure reaches this maximum, then the filters must be replaced. A record shall be kept of when filters are replaced.

Parameter Monitored: PRESSURE CHANGE Upper Permit Limit: 5.0 inches of water Monitoring Frequency: WEEKLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -

SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 6 NYCRR 200.7

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-0LPPS

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The two sets of filters prior to the vacuum pump must be replaced every 6 months, and a record of when they were replaced must be maintained.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-0MISC Emission Point: 00012 Process: 012 Emission Source: 0012A

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility must monitor flow rate through the scrubber

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and record the gauge indication at least weekly when the autoclave is in operation. If the flow rate falls below 1.0 gallons per minute, the scrubber must be inspected and the appropriate corrective action taken. Any repairs made to the scrubber shall be documented.

This monitoring will ensure the required emission reduction of 75 percent.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 1.0 gallons per minute

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED

VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-0MISC Emission Point: 00018 Process: 018 Emission Source: 0018A

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility must monitor scrubber differential pressure and record the gauge indication at least weekly when the acid tank is in operation. If the differential pressure goes above 6.0 inches of water or falls below 3.0 inches of water, the scrubber must be inspected and the appropriate corrective action taken. Any repairs made to the scrubber shall be documented.

This monitoring will ensure the required emission reduction of 90 percent.

Parameter Monitored: PRESSURE CHANGE Lower Permit Limit: 3.0 inches of water Upper Permit Limit: 6.0 inches of water Monitoring Frequency: WEEKLY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED

RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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Condition 12: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-0MISC Emission Point: 00033 Process: 033 Emission Source: 0033A

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 12.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A reduction in emissions of at least 99 percent must be achieved for the contaminants listed above.

Monitoring of scrubber differential pressure will be used to demonstrate compliance with this emission reduction limit. The differential pressure must be read and recorded weekly if the process is in operation. If the pressure exceeds 4 inches of water, the scrubber packing must be replaced, and a record kept.

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 4 inches of water Monitoring Frequency: WEEKLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -

SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 13: Contaminant List

Effective between the dates of 11/08/2013 and 11/07/2023

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Applicable State Requirement: ECL 19-0301

Item 13.1:

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

CAS No: 007440-02-0

Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 007440-47-3 Name: CHROMIUM

CAS No: 007664-39-3

Name: HYDROGEN FLUORIDE

CAS No: 0NY075-00-0 Name: PARTICULATES

Condition 14: Malfunctions and start-up/shutdown activities

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement: 6 NYCRR 201-1.4

Item 14.1:

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.
- (c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.
- (d) The department may also require the owner or operator to include, in reports described



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under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

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

Condition 15: **Emission Unit Definition**

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 15.1:

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

Emission Unit: U-00APS **Emission Unit Description:**

> Seven air plasma spray units used to apply various metal coatings to turbine parts. Emissions include metals from coatings. There are dust collectors on each of the exhausts.

Building(s): 1

Item 15.2:

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

Emission Unit: U-0EVAP Emission Unit Description:

This emission unit consists of three evaporators.

Building(s): 1

Item 15.3:

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

Emission Unit: U-0LPPS Emission Unit Description:

> Three low-pressure, electro-plasma spray units to powder coat aircraft engine parts. The coating is done in a vacuum chamber and overspray passes through a vacuum pump. Emissions are controlled with filters prior to the pump and with an oil bath after the pump. Emissions include various metals from the powder.

Building(s): 1

Item 15.4:

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

Emission Unit: U-0MISC

Emission Unit Description:

This emission unit includes the following emission sources: the quality control saw, the autoclave, the acid

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tanks, the peel coat operation, the Huffman laser welding machine, and the hydrogen fluoride cleaning operation.

Building(s): 1

Item 15.5:

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

Emission Unit: U-00VEN Emission Unit Description:

This emission unit consists of two epoxy burn-off ovens.

Building(s): 1

Condition 16: Renewal deadlines for state facility permits

Effective between the dates of 11/08/2013 and 11/07/2023

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

Item 16.1:

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

Condition 17: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

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

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 18: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

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Applicable State Requirement: 6 NYCRR 201-5.4 (e)

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Changes at a facility that meet all of the criteria listed below may not require a permit modification and may be conducted without the prior approval of the Department.

- 1. Changes that do not cause facility emissions to exceed any emission limitation or other condition in the facility's permit.
- 2. Changes that do not cause the facility to become subject to any additional regulations or requirements.
- 3. Changes that do not seek to establish or modify a federally enforceable emission cap or limit.

The facility owner or operator must maintain records of the date and description of each such change for a period of at least five years. Records must be made available for review to Department representatives upon request, and must include the following information at a minimum:

- 1. Identification of the emission unit, process(es), emission source(s), and emission point(s) affected by the change;
- 2. The date on which the change occurred; and
- 3. A description of the change.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Visible Emissions Limited

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement: 6 NYCRR 211.2

Item 19.1:

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

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**** Emission Unit Level ****

Condition 20: Emission Point Definition By Emission Unit

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 20.1:

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

Emission Unit: U-00APS

Emission Point: 00011

Height (ft.): 27 Length (in.): 25 Width (in.): 60 NYTMN (km.): 4590.9 NYTME (km.): 551.5 Building: 1

Emission Point: 00019

Height (ft.): 23 Diameter (in.): 26

NYTMN (km.): 4590.694 NYTME (km.): 552.078 Building: 1

Emission Point: 00022

Height (ft.): 29 Diameter (in.): 26

NYTMN (km.): 4590.74 NYTME (km.): 552.078 Building: 1

Emission Point: 00024

Height (ft.): 29 Diameter (in.): 26

NYTMN (km.): 4590.74 NYTME (km.): 552.078 Building: 1

Emission Point: 00025

Height (ft.): 29 Diameter (in.): 26

NYTMN (km.): 4590.74 NYTME (km.): 552.078 Building: 1

Emission Point: 00034

Height (ft.): 36 Length (in.): 72 Width (in.): 48 NYTMN (km.): 4590.8 NYTME (km.): 551.8 Building: 1

Emission Point: 00035

Height (ft.): 35 Length (in.): 72 Width (in.): 24 NYTMN (km.): 4590.8 NYTME (km.): 551.8 Building: 1

Item 20.2:

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

Emission Unit: U-0EVAP

Emission Point: 00029

Height (ft.): 39 Diameter (in.): 8

NYTMN (km.): 4590.8 NYTME (km.): 551.8 Building: 1



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Emission Point: 00030

Height (ft.): 40 Diameter (in.): 6

NYTMN (km.): 4590.8 NYTME (km.): 551.8 Building: 1

Emission Point: 00031

Height (ft.): 36 Diameter (in.): 5

NYTMN (km.): 4590.8 NYTME (km.): 551.8 Building: 1

Item 20.3:

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

Emission Unit: U-0LPPS

Emission Point: 00013

Height (ft.): 30 Diameter (in.): 8

NYTMN (km.): 4590.9 NYTME (km.): 551.5 Building: 1

Emission Point: 00021

Height (ft.): 29 Diameter (in.): 8

NYTMN (km.): 4590.74 NYTME (km.): 552.078 Building: 1

Emission Point: 00026

Height (ft.): 29 Diameter (in.): 8

NYTMN (km.): 4590.74 NYTME (km.): 552.078 Building: 1

Item 20.4:

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

Emission Unit: U-0MISC

Emission Point: 00005

Height (ft.): 27 Diameter (in.): 12

NYTMN (km.): 4590.9 NYTME (km.): 551.5 Building: 1

Emission Point: 00012

Height (ft.): 28 Diameter (in.): 6

NYTMN (km.): 4590.5 NYTME (km.): 551.5 Building: 1

Emission Point: 00018

Height (ft.): 37 Diameter (in.): 30

NYTMN (km.): 4590.9 NYTME (km.): 551.5 Building: 1

Emission Point: 00020

Height (ft.): 29 Diameter (in.): 8

NYTMN (km.): 4590.74 NYTME (km.): 552.078 Building: 1

Emission Point: 00032

Height (ft.): 39 Diameter (in.): 6

NYTMN (km.): 4590.8 NYTME (km.): 551.8 Building: 1

Emission Point: 00033

Height (ft.): 32 Diameter (in.): 6

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NYTMN (km.): 4590.8 NYTME (km.): 551.8 Building: 1

Item 20.5:

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

Emission Unit: U-00VEN

Emission Point: 00023

Height (ft.): 29 Diameter (in.): 9

NYTMN (km.): 4590.74 NYTME (km.): 552.078 Building: 1

Emission Point: 00028

Height (ft.): 29 Diameter (in.): 3

NYTMN (km.): 4590.72 NYTME (km.): 552.121 Building: 1

Condition 21: Process Definition By Emission Unit

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 21.1:

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

Emission Unit: U-00APS

Process: APS Source Classification Code: 3-09-045-00

Process Description:

Coating of turbine parts with air plasma spray. Hydrogen is utilized in the process to achieve high operating

temperatures.

Emission Source/Control: 0011A - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0011B - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0019A - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0019B - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0022A - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0022B - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0024A - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0024B - Control

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Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0025A - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0025B - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0034A - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0034B - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0035A - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0035B - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 00011 - Process

Emission Source/Control: 00019 - Process

Emission Source/Control: 00022 - Process

Emission Source/Control: 00024 - Process

Emission Source/Control: 00025 - Process

Emission Source/Control: 00034 - Process

Emission Source/Control: 00035 - Process

Item 21.2:

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

Emission Unit: U-0EVAP

Process: 029 Source Classification Code: 4-90-001-99

Process Description:

Input fluid is heated to boiling point. Vapors are

exhausted to the atmosphere.

Emission Source/Control: 00029 - Process

Emission Source/Control: 00030 - Process

Emission Source/Control: 00031 - Process

Item 21.3:

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



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Emission Unit: U-0LPPS

Process: LPS Source Classification Code: 3-09-040-20

Process Description:

Coating of aircraft engine parts with a low-pressure,

electro-plasma spray.

Emission Source/Control: 0013A - Control Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0013B - Control Control Type: LIQUID FILTRATION SYSTEM

Emission Source/Control: 0021A - Control Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0021B - Control Control Type: LIQUID FILTRATION SYSTEM

Emission Source/Control: 0026A - Control Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0026B - Control Control Type: LIQUID FILTRATION SYSTEM

Emission Source/Control: 00013 - Process

Emission Source/Control: 00021 - Process

Emission Source/Control: 00026 - Process

Item 21.4:

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

Emission Unit: U-0MISC

Process: 005 Source Classification Code: 3-09-030-05

Process Description:

Cutting sections of engine parts and vanes for quality

control purposes.

Emission Source/Control: 00005 - Process

Item 21.5:

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

Emission Unit: U-0MISC

Process: 012 Source Classification Code: 3-09-011-01

Process Description:

Metal oxide/ceramic coatings are removed from turbine blades and parts. This is achieved by loading the autoclave vessel with the blades and parts, and filling the chamber with a 45% potassium hydroxide solution. The vessel is then heated and pressurized. At the end of the



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cleaning cycle, the pressure from the chamber is released and potassium hydroxide is emitted. The emissions are reduced by a water spray tower.

Emission Source/Control: 0012A - Control

Control Type: SPRAY TOWER

Emission Source/Control: 00012 - Process

Item 21.6:

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

Emission Unit: U-0MISC

Process: 018 Source Classification Code: 3-09-011-02

Process Description:

Metal parts are placed in hydrochloric and nitric acid baths for cleaning. A liquid inhibitor (ARMOHIB) is used in the hydrochloric acid bath (3% of the acid volume) to enhance the cleaning and coating of the parts. Emissions include both hydrochloric and nitric acid and these emissions are reduced by a scrubber.

Emission Source/Control: 0018A - Control Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: 00018 - Process

Item 21.7:

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

Emission Unit: U-0MISC

Process: 020 Source Classification Code: 4-02-025-01

Process Description:

Turbine parts are dipped in melted thermoplastic and hung to cool. Potential VOC emissions occur from the thermal degradation of the thermoplastic. Emissions are vented via the exhaust hood and an 8 inch stack.

Emission Source/Control: 00020 - Process

Item 21.8:

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

Emission Unit: U-0MISC

Process: 032

Process Description:

The Huffman laser welding machine is used to cut and weld turbine parts that are made primarily out of nickel.

Emission Source/Control: 00032 - Process

Item 21.9:



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

Emission Unit: U-0MISC

Process: 033

Process Description:

The hydrogen flouride cleaning operation involves the use of hydrogen and hydrogen fluoride gases in an industrial furnace for the purpose of removing scale and oxides from surfaces and cracks for turbine engine parts. The process also removes residual coatings from parts being repaired.

Emission Source/Control: 0033A - Control

Control Type: PACKED GAS ABSORPTION SYSTEM, VENTURI

SCRUBBER

Emission Source/Control: 00033 - Process

Item 21.10:

Renewal 1

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

Emission Unit: U-00VEN

Process: 023 Source Classification Code: 3-09-001-99

Process Description:

Small amounts of epoxy are injected into the ends of airfoils. A batch of airfoils are then placed into an

electric furnace for one hour to remove epoxy through heat treatment. There are up to 30 airfoils in each batch.

Emission Source/Control: 00023 - Process

Emission Source/Control: 00028 - Process



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