



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3730-00022/02001
Effective Date: 03/26/2010 Expiration Date: 03/25/2015

Permit Issued To:HIPOTRONICS/HUBBELL INC
584 DERBY MILFORD RD
ORANGE, CT 06477-4024

Contact: HIPOTRONICS/HUBBELL INC
584 DERBY MILFORD RD
ORANGE, CT 06477-4024
(203) 924-9544

Facility: HIPOTRONICS INC
1650 ST RTE 22 N
BREWSTER, NY 10509

Contact: ANTHONY MASTRO
HIPOTRONICS INC
1650 ST RTE 22 P O BOX 414
BREWSTER, NY 10509
(845) 279-3644

Description:

Hipotronics Inc manufactures and assembles high voltage test equipment for utilities and producers of power delivery apparatus. This includes high voltage transformers and reactors, tanks, high voltage capacitors, high voltage bushings, tap switches and toroids, PVT regulators, and electronic subassemblies and controls.

Permitted sources consist of five curing ovens, three paint spray booths and a general process exhaust. The facility operates exempt/trivial sources including maintenance/vocational activities. Heating needs are met by three exempt 1.8 mmBTU/ hr gas fired space heaters and small hot water boilers. There are no emergency generators onsite.

Building 1 contains testing, manufacturing support, shipping and administration. It houses a transformer winding department, wire shop, varnish impregnation process, small nickel plating process, parts coating, and assembly operations.

Building 2 contains testing, painting, welding, sheet metal, sales and dielectric fluid departments. Metal fabrication includes metal surface grinders. The wet painting department contains 2 paint booths and an aqueous pre-cleaning line. Painting is by Spray (90%) and rollers (10%) methods. The Spray booths have particulate filter control, negative pressure and exhaust through separate stacks. Products painted include sheet metal, fiberglass, tanks and panels. The paint booth fiberglass filters are changed monthly or as necessary. The solvent used for cleanup and related paint wastes are currently disposed as hazardous waste.



Building 3 contains welding and metal fabrication.

VOC emissions have been capped below 10 tons per year as defined by permit condition under 6NYCRR Part 201-7. This governing limit shall qualify the facility as exempt from 6 NYCRR 228 applicability. The facility is subject to monitoring and reporting requirements under 6 NYCRR Parts 201, 212 and 40 CFR 63 Subpart WWWW. The facility is not subject to 40 CFR 60 Subpart HHHHHH (§ 63.11170(a)(3)). Various other NESHAP regulations do not apply because Hipotronics is not a major source of HAPs.

Modification 0

The proposed modification involves the addition of a primer to the spray coating operations. This will result in greater paint and coating durability of manufactured equipment. The facility shall comply with a VOC emissions cap of less than 10 tons per year. A state facility permit will supersede the current registration and shall contain all applicable state and federal regulations

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: KENNETH R GRZYB
 NYSDEC REGION 3
 21 S PUTT CORNERS RD
 NEW PALTZ, NY 12561

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.



Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

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

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

Condition 5: Submission of 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

New York State Department of Environmental Conservation

Permit ID: 3-3730-00022/02001

Facility DEC ID: 3373000022



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To:HIPOTRONICS/HUBBELL INC
584 DERBY MILFORD RD
ORANGE, CT 06477-4024

Facility: HIPOTRONICS INC
1650 ST RTE 22 N
BREWSTER, NY 10509

Authorized Activity By Standard Industrial Classification Code:
3612 - TRANSFORMERS
3825 - INSTRUMENTS TO MEASURE ELEC

Permit Effective Date: 03/26/2010

Permit Expiration Date: 03/25/2015



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 3 6 NYCRR 212.4: Compliance Demonstration
- 4 6 NYCRR 212.6 (a): Compliance Demonstration
- 5 6 NYCRR 212.9 (b): Compliance Demonstration
- 6 40CFR 63, Subpart WWWW: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 7 ECL 19-0301: Contaminant List
- 8 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 9 6 NYCRR Subpart 201-5: Emission Unit Definition
- 10 6 NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 11 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 12 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



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,



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:

- (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 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 - 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



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: Visible Emissions Limited - 6 NYCRR 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 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 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 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 1: Facility Permissible Emissions
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1.1:

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: 0NY998-00-0
Name: VOC

PTE: 20,000 pounds per year

Condition 2: Capping Monitoring Condition
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2.1:

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:

6 NYCRR Part 228

Item 2.2:

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

Item 2.3:

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 2.4:

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

New York State Department of Environmental Conservation

Permit ID: 3-3730-00022/02001

Facility DEC ID: 3373000022



Item 3.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00003

Emission Point: EXHST

Process: EXH

Emission Source: EXHST

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Hipotronics Inc. shall not cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis

The Department reserves the right to request appropriate performance testing to verify compliance (EPA Methods).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 4.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00001

Emission Point: TFCO1

Process: CUR

Emission Source: TRCO1

Emission Unit: U-00001

Emission Point: TFCO2

Process: CUR

Emission Source: TRCO2

Emission Unit: U-00001

Emission Point: TFCOE

Process: CUR

Emission Source: TRCO3

Emission Unit: U-00001

Emission Point: VRSH1

Process: CUR

Emission Source: VICO1

Emission Unit: U-00001

Emission Point: VRSH2

Process: CUR

Emission Source: VICO2



Emission Unit: U-00003
Process: EXH

Emission Point: EXHST
Emission Source: EXHST

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Average opacity, based on any six consecutive minutes, is limited to less than 20 percent, except only the emission of uncombined water. Any deviations shall be reported to the Department, along with corrective action.

The Department reserves the right to perform or require Hipotronics Inc conduct a Method 9 opacity evaluation at any time during facility operation to determine compliance.

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 5.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00001
Process: CUR

Emission Point: TFCO1
Emission Source: TRCO1

Emission Unit: U-00001
Process: CUR

Emission Point: TFCO2
Emission Source: TRCO2

Emission Unit: U-00001
Process: CUR

Emission Point: TFCOE
Emission Source: TRCO3

Emission Unit: U-00001
Process: CUR

Emission Point: VRSH1
Emission Source: VICO1

Emission Unit: U-00001
Process: CUR

Emission Point: VRSH2
Emission Source: VICO2

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP
CAS No: 0NY998-00-0 VOC



Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The above identified emissions points consist of VOC/HAP emissions when curing coated products and do not require a degree of air cleaning based on emission rate potential. Hipotronics Inc. shall not cause or allow emissions that exceed the applicable permissible emission rate as described below [§212.9(b) Table 2];

Environmental Rating -Gases and Liquid Particulate Emissions (Environmental Rating A,B,C or D)

A	1 lbs/hr
B	10 lbs/hr
C	20 lbs/hr

The facility shall maintain documentation of compliance as appropriate. All records shall be available to the Department upon request.

The Department reserves the right to request appropriate performance testing to verify compliance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Compliance Demonstration
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable Federal Requirement:40CFR 63, Subpart WWWW

Item 6.1:

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

Emission Unit: U-00001

Process: NIC

Emission Source: NICPL

Regulated Contaminant(s):

CAS No: 0NY059-28-0 NICKEL (NI 059)

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Hipotronics Inc is subject to the requirements of 40 CFR 63 Subpart WWWW National Emission Standards for



Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations and the requirements of 40 CFR 60.A - General provisions.

The facility, utilizing a batch, non-cyanide, 'flash' or short-term electroplating tank operating at a pH of 4.5 containing nickel ingots within the bath, shall comply with the follow requirements;

§ 63.11507

a(1) Use a wetting agent, as defined in §63.11511, in the bath of the affected tank according to paragraphs

(a)(1)(i) through (ii) of this section.

(i) Initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process.

(ii) Add wetting agent in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.

b(1) Limit short-term or 'flash' electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(g) Implement the applicable management practices in paragraphs (g)(1) through (12) of this section, as practicable.

(1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.

(2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.

(3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.

(4) Use tank covers, if already owned and available at the facility, whenever practicable.

(5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).

(6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.

(7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated



parts to be plated, as practicable.

(8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.

(9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.

(10) Minimize spills and overflow of tanks, as practicable.

(11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.

(12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

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(a) The facility shall submit a Notification of Compliance Status in accordance with §63.11509(b).

(b) Be in compliance with the applicable management practices and equipment standards in this subpart at all times.

(c) The facility shall satisfy the requirements specified in paragraphs (1) and (5) of this section as applicable.

(1) The facility shall demonstrate initial compliance according to paragraphs (1)(i) through (iv) of this section.

(i) Add wetting agent to the bath of each affected tank according to manufacturer's specifications and instructions.

(ii) State in Notification of Compliance Status that the facility adds wetting agent to the bath according to manufacturer's specifications and instructions.

(iii) Implement the applicable management practices specified in §63.11507(g) as practicable.

(iv) The facility shall state in the Notification of Compliance Status that it has implemented the applicable management practices specified in §63.11507(g) as practicable.

(5) The facility shall demonstrate initial compliance according to paragraphs (5)(i) through (iii) of this section.

(i) State in the Notification of Compliance Status that limit short-term or flash electroplating to no more than 1 cumulative hour per day, or 3 cumulative minutes per hour of plating time.

(ii) Implement the applicable management practices specified in §63.11507(g) as practicable.

(iii) State in the Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g) as practicable.



(d) To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this subpart, the facility shall satisfy the requirements specified below;

(1) Always operate and maintain your affected source, including air pollution control equipment.

(2) Prepare an annual compliance certification according to the requirements specified in §63.11509(c), and keep it in a readily-accessible location for inspector review.

(3) The facility, using a wetting agent to comply with this subpart, shall demonstrate continuous compliance according to paragraphs (d)(3)(i) through (iii) of this section.

(i) Record that you have added the wetting agent to the tank bath in the original make-up of the tank.

(ii) For tanks where the wetting agent is a separate purchased ingredient from the other tank additives, demonstrate continuous compliance according to paragraphs (d)(3)(ii) (A) and (B) this section.

(A) Add wetting agent in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.

(B) Record each addition of wetting agent to the tank bath.

(iii) State in the annual compliance certification that you have added wetting agent to the bath according to the manufacturer's specifications and instructions.

(5) The facility, in limiting the plating time for the affected tank, shall demonstrate continuous compliance according to paragraphs (d)(5)(i) through (iii) of this section.

(i) Limit short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(ii) Record the times that the affected tank is operated each day.

(iii) State in the annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(8) The facility is subject to the management practices specified in §63.11507(g) and shall demonstrate continuous compliance according to paragraphs (d)(8)(i) and (ii) of this section.

(i) Implement the applicable management practices during all times that the affected tank or process is in operation.

(ii) State in the annual compliance certification that you have implemented the applicable management practices, as practicable.



§ 63.11509

(a) The facility shall submit an Initial Notification in accordance with paragraphs (a)(1) through (3) of this section by the dates specified.

(1) The Initial Notification must include the information specified in §63.9(b)(2)(i) through (iv) of the General Provisions of this part.

(2) The Initial Notification must include a description of the compliance method (e.g., use of wetting agent/fume suppressant) for each affected source.

(3) Submit an Initial Notification not later than 120 calendar days after July 1, 2008.

(b) The facility shall submit a Notification of Compliance Status in accordance with paragraphs (b)(1) and (2) of this section.

(1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in §63.11506.

(2) The Notification of Compliance Status must include the items specified in paragraphs (b)(2)(i) through (iv) of this section.

(i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.

(ii) Methods used to comply with the applicable management practices and equipment standards.

(iii) Description of the capture and emission control systems used to comply with the applicable equipment standards.

(iv) Statement by the facility as to whether the source is in compliance with the applicable standards or other requirements.

(c) Prepare an annual certification of compliance report according to paragraphs below. These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report.

(1) State in annual compliance certification that you have added wetting agent to the bath according to the manufacturer's specifications and instructions.

(3) State in the annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(6) State in the annual compliance certification that you have implemented the applicable management practices, as practicable.

(7) Each annual compliance report must be prepared no later than January 31 of the year immediately following



the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

(d) Report the deviations, along with the corrective action taken, and submit this report to the Department.

(e) The facility must keep the records specified in paragraphs (e)(1) through (3) of this section.

(1) A copy of any Initial Notification and Notification of Compliance Status that the facility submitted and all documentation supporting those notifications.

(2) The records specified in §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part, which states;

General recordkeeping requirements - The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records.

(i) The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards;

(ii) The occurrence and duration of each malfunction of operation (i.e., process equipment) or the required air pollution control and monitoring equipment;

(iii) All required maintenance performed on the air pollution control and monitoring equipment;

(xiv) All documentation supporting initial notifications and notifications of compliance status under §63.9.

(3) The records required to show continuous compliance with each management practice and equipment standard that applies, as specified in §63.11508(d).

(f) The facility shall keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to part 63. Records may be kept offsite for the remaining 3 years.

§ 63.11510

The facility shall comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 1 of this subpart.

New York State Department of Environmental Conservation

Permit ID: 3-3730-00022/02001

Facility DEC ID: 3373000022



Citation	Subject
63.1	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5), (j)	Compliance with standards and maintenance requirements.
63.10(a), (b)(1), (b)(2)(i)-(iii),(xiv), (b)(3), (d)(1), (f)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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 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 7: Contaminant List
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable State Requirement:ECL 19-0301

Item 7.1:

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

CAS No: 0NY059-28-0
Name: NICKEL (NI 059)

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

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

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

Condition 8: Unavoidable noncompliance and violations
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable State Requirement:6 NYCRR 201-1.4

Item 8.1:

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

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued 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 superseded 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 9: Emission Unit Definition
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 9.1:

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

Emission Unit: U-00001

Emission Unit Description:

Emissions unit consists of the following departments;

Building 1

Transformer Winding - Includes 3 electric transformer and epoxy curing ovens (Emission points TFCO1, TFCO2, TFCOE, Emissions Sources TRCO1, TRCO2, TRCO3) for baking coils used in transformer manufacturing. Emissions consist of VOCs/HAPs.

PVT Nickel Plating (NIC)- Fully contained nickel plating operation (NICPL) with no external emissions points.

Varnish Impregnation - 2 electric ovens (Emission Points VRSH1, VRSH2, Emission Sources VICO1, VICO2) used to cure varnish coated equipment. Emissions consist of VOCs/HAPs.



Machine shop - Maintenance shop with closed loop emission collector systems.

Building(s): Building1

Item 9.2:

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

Emission Unit: U-00002

Emission Unit Description:

Emissions Unit consists of the following departments;

Building 2

Capacitor Department - One electrical drying process oven for the purpose of expelling moisture. Emissions consisting of water vapor and therefore is exempt.

Spraying Department - Two spray booths (Emissions Points SPRY1, SPRY2, Emission Sources/ Controls SPRY1, SBFL1, SPRY2, SBFL2) used for coating sheet metal, fiberglass, tanks and panels. Also a diluted acid etching tank with no atmospheric exhaust.

Sheet Metal Department - Two grainers used to create a specific finish for aluminum and steel panels. Indoor dust collectors capture particulates and are exempt from permitting.

Building 3

Lowbay - Final Assembly of products. Includes a spray booth for finishing coatings (Emissions Point SPRYLO, Emission Source/ Control SPRY3, SBFL3)

Building(s): Building2
Building3

Item 9.3:

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

Emission Unit: U-00003

Emission Unit Description:

Emissions Unit consists of the following departments;

Building 2

Welding Department - Nonautomated welding operations. Three exhaust fans for human comfort and two closed loop room filtration units all exempt from permitting. One emissions point formerly a paint spray booth and now used

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for welding operation particulate exhaust (Emissions Point EXHST, Emission Source EXHST).

Building(s): Building2

Condition 10: Air pollution prohibited
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable State Requirement:6 NYCRR 211.2

Item 10.1:

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 ******

Condition 11: Emission Point Definition By Emission Unit
Effective between the dates of 03/26/2010 and 03/25/2015

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 11.1:

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

Emission Unit: U-00001

Emission Point: TFCO1

Height (ft.): 8 Diameter (in.): 6

NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1

Emission Point: TFCO2

Height (ft.): 7 Diameter (in.): 6

NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1

Emission Point: TFCOE

Height (ft.): 9 Diameter (in.): 4

NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1

Emission Point: VRSH1

Height (ft.): 11 Diameter (in.): 8

NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1

Emission Point: VRSH2

Height (ft.): 15 Diameter (in.): 10

NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1



Item 11.2:

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

Emission Unit: U-00002

Emission Point: SPRY1

Height (ft.): 10 Diameter (in.): 36
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building2

Emission Point: SPRY2

Height (ft.): 12 Diameter (in.): 36
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building2

Emission Point: SPYLO

Height (ft.): 5 Diameter (in.): 30
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building3

Item 11.3:

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

Emission Unit: U-00003

Emission Point: EXHST

Height (ft.): 17 Diameter (in.): 36
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building2

**Condition 12: Process Definition By Emission Unit
Effective between the dates of 03/26/2010 and 03/25/2015**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 12.1:

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

Emission Unit: U-00001

Process: CUR Source Classification Code: 3-05-037-06

Process Description:

The curing of various coated products by electric ovens.

Emission Source/Control: TRCO1 - Process

Emission Source/Control: TRCO2 - Process

Emission Source/Control: TRCO3 - Process

Emission Source/Control: VICO1 - Process

Emission Source/Control: VICO2 - Process

Item 12.2:

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



Emission Unit: U-00001
Process: NIC Source Classification Code: 3-09-010-03
Process Description:
PVT Nickel Plating - Fully contained nickel plating
operation with no external emissions points.

Emission Source/Control: NICPL - Process

Item 12.3:

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

Emission Unit: U-00002
Process: SPY Source Classification Code: 4-02-001-01
Process Description: Coating of equipment in Spray Booths.

Emission Source/Control: SBFL1 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: SBFL2 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: SBFL3 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: SPRY1 - Process

Emission Source/Control: SPRY2 - Process

Emission Source/Control: SPRY3 - Process

Item 12.4:

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

Emission Unit: U-00003
Process: EXH Source Classification Code: 3-09-005-00
Process Description:
Miscellaneous operations requiring atmospheric exhaust.

Emission Source/Control: EXHST - Process

