



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 4-0138-00001/00031
Mod 0 Effective Date: 03/12/2004 Expiration Date: 03/12/2009

Mod 2 Effective Date: 06/06/2008 Expiration Date: No expiration date.

Permit Issued To: HANNAY REELS INC
553 STATE RTE 143
PO BOX 159
WESTERLO, NY 12193-0159

Contact: HANNAY REELS INC
553 STATE RTE 143
WESTERLO, NY 12193-0159
(518) 797-3791

Facility: HANNAY REELS INC
553 ST RTE 143
WESTERLO, NY 12193

Description:
Hannay Reels Inc is submitting this State Facility Application to modify the existing permit. In particular, Hannay wishes to install a new particulate control system, a new spray painting booth and an additional solvent wipe line. Currently, the particulates from the spray painting operations are controlled by fabric filters, the new system will employ a water wash system.

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: NANCY M ADAMS
1130 N WESTCOTT RD
SCHENECTADY, NY 12306-2014

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
 - Applications for Permit Renewals and Modifications
 - Permit modifications, suspensions or revocations by the Department
 - Permit Modifications, Suspensions and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 4 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 4 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 2-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 2-1.1:

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

Item 2-1.2:

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

Item 2-1.3:

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

Condition 3: Applications for Permit Renewals and Modifications



Applicable State Requirement: 6NYCRR 621.13

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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

Condition 2-2: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 2-2.1:

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

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

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

Item 4.1:

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

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



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

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 4
HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)**

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 4 Headquarters
Division of Environmental Permits
1150 North Westcott Rd.
Schenectady, NY 12306-2014
(518) 357-2069

**Condition 2-3: Submission of application for permit modification or renewal-REGION 4
HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)**

Item 2-3.1:

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

NYSDEC Regional Permit Administrator
Region 4 Headquarters
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014
(518) 357-2069



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:HANNAY REELS INC
553 STATE RTE 143
PO BOX 159
WESTERLO, NY 12193-0159

Facility: HANNAY REELS INC
553 ST RTE 143
WESTERLO, NY 12193

Authorized Activity By Standard Industrial Classification Code:
3429 - HARDWARE, NEC
3499 - FABRICATED METAL PRODUCTS, NEC

Mod 0 Permit Effective Date: 03/12/2004

Permit Expiration Date: 03/12/2009

Mod 2 Permit Effective Date: 06/06/2008

Permit Expiration Date: No expiration date.



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
 - Applications for Permit Renewals and Modifications
 - Permit modifications, suspensions or revocations by the Department
 - Permit Modifications, Suspensions and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 4 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 2-1 6NYCRR 201-7.2: Facility Permissible Emissions
- *2-2 6NYCRR 201-7.2: Capping Monitoring Condition
- *2-3 6NYCRR 201-7.2: Capping Monitoring Condition
- *2-4 6NYCRR 201-7.2: Capping Monitoring Condition
- 2-5 6NYCRR 212.4(c): Compliance Demonstration
- 2-6 6NYCRR 212.4(c): Compliance Demonstration
- 7 6NYCRR 225-1.2(a)(2): Compliance Demonstration
- 8 6NYCRR 228.1(a): Permit Requirements
- 9 6NYCRR 228.1(d): Will remain subject
- 10 6NYCRR 228.5(j): Compliance Demonstration
- 11 6NYCRR 228.5(k): Compliance Demonstration
- 12 6NYCRR 228.10: Handling, storage and disposal of VOCs

Emission Unit Level

EU=0-00001

- 13 6NYCRR 228.4: Compliance Demonstration
- 14 6NYCRR 228.5(a): Compliance Demonstration
- 15 6NYCRR 228.5(b): Use of Methods 311 or 24.

EU=0-00001,Proc=001

- 16 6NYCRR 228.1(b)(4): Compliance Demonstration

EU=0-00001,Proc=002

- 17 6NYCRR 228.1(b)(4): Compliance Demonstration
- 18 6NYCRR 228.1(b)(4): Compliance Demonstration

EU=0-00001,Proc=003

- 19 6NYCRR 226.2: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 26 ECL 19-0301: Contaminant List



27 6NYCRR 201-1.4: Unavoidable noncompliance and violations

28 6NYCRR 201-5: Emission Unit Definition

29 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

30 6NYCRR 201-5: Emission Point Definition By Emission Unit

31 6NYCRR 201-5: Process Definition By Emission Unit

EU=0-00001

32 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

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 - 6NYCRR Part 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

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



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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6NYCRR Part 201-1.5

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

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

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

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

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

(4) The facility owner and/or operator notified the Department

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

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

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



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

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

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

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

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

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

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

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

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

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air



pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not 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 2-1: Facility Permissible Emissions
Effective between the dates of 06/06/2008 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 2-1.1:

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: 000050-00-0 (From Mod 2) Name: FORMALDEHYDE	PTE: 19,000 pounds per year
CAS No: 000067-56-1 (From Mod 2) Name: METHYL ALCOHOL	PTE: 19,000 pounds per year
CAS No: 000078-93-3 (From Mod 2) Name: METHYL ETHYL KETONE	PTE: 19,000 pounds per year
CAS No: 000098-82-8 (From Mod 2) Name: BENZENE, (1-METHYLETHYL)	PTE: 19,000 pounds per year
CAS No: 000100-41-4 (From Mod 2) Name: ETHYLBENZENE	PTE: 19,000 pounds per year
CAS No: 000100-42-5 (From Mod 2) Name: STYRENE	PTE: 19,000 pounds per year
CAS No: 000107-21-1 (From Mod 2) Name: 1,2-ETHANEDIOL	PTE: 19,000 pounds per year
CAS No: 000108-10-1 (From Mod 2) Name: 2-PENTANONE, 4-METHYL	PTE: 19,000 pounds per year
CAS No: 000108-88-3 (From Mod 2) Name: TOLUENE	PTE: 19,000 pounds per year
CAS No: 000111-46-6 (From Mod 2) Name: ETHANOL, 2,2'-OXYBIS-	PTE: 19,000 pounds per year
CAS No: 000111-90-0 (From Mod 2) Name: ETHANOL, 2- (2-ETHOXYETHOXY)	PTE: 19,000 pounds per year
CAS No: 000112-34-5 (From Mod 2) Name: ETHANOL, 2-(2-BUTOXYETHOXY)-	PTE: 19,000 pounds per year
CAS No: 001330-20-7 (From Mod 2) Name: XYLENE, M, O & P MIXT.	PTE: 19,000 pounds per year



CAS No: 002807-30-9 (From Mod 2) Name: 2-PROPOXY ETHANOL	PTE: 19,000 pounds per year
CAS No: 007439-92-1 (From Mod 2) Name: LEAD	PTE: 19,000 pounds per year
CAS No: 068186-90-3 (From Mod 2) Name: CI PIGMENT BROWN 24	PTE: 19,000 pounds per year
CAS No: 0NY100-00-0 (From Mod 2) Name: HAP	PTE: 47,500 pounds per year
CAS No: 0NY998-00-0 (From Mod 2) Name: VOC	PTE: 95,000 pounds per year

Condition 2-2: Capping Monitoring Condition
Effective between the dates of 06/06/2008 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 2-2.1:

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:

6NYCRR 201-6

Item 2-2.2:

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

Item 2-2.3:

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 2-2.4:

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 applicable requirement.

Item 2-2.5:

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

Item 2-2.6:

The Compliance Demonstration activity will be performed for the Facility.



Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 2-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The emissions of total HAPs (Hazardous Air Pollutants) shall be less than 23.75 ton/yr. This is less than the applicability threshold of Part 201-6, Title V, so the facility is capped out of (avoids) that requirement.

The emissions, total usage of each coating, and solvent usage shall be included in the annual report. Records shall be kept for 5 years.

Parameter Monitored: HAP

Upper Permit Limit: 23.75 tons

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 2-3: Capping Monitoring Condition

Effective between the dates of 06/06/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 2-3.1:

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

6NYCRR 201-6

Item 2-3.2:

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

Item 2-3.3:

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 2-3.4:



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

Item 2-3.5:

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

Item 2-3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The emissions of VOC (Volatile Organic Compounds) shall be less than 47.5 ton/yr. This is less than the applicability threshold of Part 201-6, Title V, so the facility is capped out of (avoids) that requirement.

The emissions, total usage of each coating, and solvent usage shall be included in the annual report. Records shall be kept for 5 years.

Parameter Monitored: VOC

Upper Permit Limit: 47.5 tons

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 2-4: Capping Monitoring Condition

Effective between the dates of 06/06/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 2-4.1:

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

6NYCRR 201-6



Item 2-4.2:

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

Item 2-4.3:

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

Item 2-4.4:

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

Item 2-4.5:

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

Item 2-4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000050-00-0	FORMALDEHYDE
CAS No: 000067-56-1	METHYL ALCOHOL
CAS No: 000078-93-3	METHYL ETHYL KETONE
CAS No: 000098-82-8	BENZENE, (1-METHYLETHYL)
CAS No: 000100-42-5	STYRENE
CAS No: 000107-21-1	1,2-ETHANEDIOL
CAS No: 000108-10-1	2-PENTANONE, 4-METHYL
CAS No: 000108-88-3	TOLUENE
CAS No: 000111-46-6	ETHANOL, 2,2'-OXYBIS-
CAS No: 000111-90-0	ETHANOL, 2- (2-ETHOXYETHOXY)
CAS No: 000112-34-5	ETHANOL, 2-(2-BUTOXYETHOXY)-
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 002807-30-9	2-PROPOXY ETHANOL
CAS No: 007439-92-1	LEAD
CAS No: 068186-90-3	CI PIGMENT BROWN 24
CAS No: 000100-41-4	ETHYLBENZENE

Item 2-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The emissions of each individual HAP (Hazardous Air Pollutant) shall be less than 9.5 ton/yr. This is less



than the applicability threshold of Part 201-6, Title V, so the facility is capped out of (avoids) that requirement.

The emissions, total usage of each coating, and solvent usage shall be included in the annual report. Records shall be kept for 5 years.

Parameter Monitored: HAP
Upper Permit Limit: 9.5 tons
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due every 12 calendar month(s).

Condition 2-5: Compliance Demonstration
Effective between the dates of 06/06/2008 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 2-5.1:

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

Emission Unit: 0-00001	Emission Point: 05SSD
Emission Unit: 0-00001	Emission Point: 05SPD
Emission Unit: 0-00001	Emission Point: 05SPC
Emission Unit: 0-00001	Emission Point: 05SPB
Emission Unit: 0-00001	Emission Point: 05SPA
Emission Unit: 0-00001	Emission Point: 05SO1
Emission Unit: 0-00001	Emission Point: 0003A
Emission Unit: 0-00001	Emission Point: 0003B

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 2-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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 at the discretion of the Department.

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-6: Compliance Demonstration

Effective between the dates of 06/06/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.4(c)

Item 2-6.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001 Emission Point: 05SSD

Emission Unit: 0-00001 Emission Point: 05SPD

Emission Unit: 0-00001 Emission Point: 05SPC

Emission Unit: 0-00001 Emission Point: 05SPB

Emission Unit: 0-00001 Emission Point: 05SPA

Emission Unit: 0-00001 Emission Point: 05SO1

Emission Unit: 0-00001 Emission Point: 0003A

Emission Unit: 0-00001 Emission Point: 0003B

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2-6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Filters for the sources listed shall be inspected for serviceability every 6 months. If found not serviceable, they will be replaced. A record documenting the inspection and the replacement of the filters shall be kept.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 7: Compliance Demonstration
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 225-1.2(a)(2)

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person shall use, purchase, sell, or offer for sale any distillate fuel oil which has a sulfur content greater than the limit presented below. A log of the sulfur content in oil per delivery must be maintained on site for a minimum of five years after the date of the last entry.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Permit Requirements
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.1(a)

Item 8.1:

Every owner or operator of a facility applying for a Title V facility permit or State facility permit, including modifications, must:

- (1) identify the method(s) (e.g., sampling, testing, etc.), if any, that will be used to comply with the requirements of this Part;
- (2) where applicable, provide a process specific reasonably available control technology (RACT) determination under subdivision 228.3(e) unless the RACT demonstration has already been approved by the Department and the Administrator and a reevaluation frequency for the RACT determination is included in the facility's existing Title V facility permit or State facility permit; and
- (3) where applicable, submit evidence to demonstrate that the shut down of a natural gas fired VOC incinerator pursuant to subdivision 228.3(b) will not jeopardize air quality.

Condition 9: Will remain subject
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.1(d)



Item 9.1:

Any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228 will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls below the thresholds set forth in 228.1(b).

Condition 10: Compliance Demonstration

Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.5(j)

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 6NYCRR Part 228 must be reported to the Department within 30 days following notice or generation of the information or record.

Monitoring Frequency: MONTHLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 11: Compliance Demonstration

Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.5(k)

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required by 6NYCRR Part 228 must be maintained at the facility for five years.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 12: Handling, storage and disposal of VOCs
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 12.1:

Within the work area(s) associated with a coating line, the owner or operator of this facility must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents.
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:
 - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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

Condition 13: Compliance Demonstration
Effective between the dates of 03/12/2004 and Permit Expiration Date



Applicable Federal Requirement:6NYCRR 228.4

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 13.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Opacity standard must be met. Compliance testing will be conducted as the discretion of the Department.

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: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration

Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.5(a)

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a



format acceptable to the Department and, upon request, these records must be submitted to the Department. Any facility required to perform the overall removal efficiency calculation, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Monitoring Frequency: MONTHLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 15: Use of Methods 311 or 24.
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.5(b)

Item 15.1:

This Condition applies to Emission Unit: 0-00001

Item 15.2:

Upon request by the Department, the owner and operator of any emission source subject to 6NYCRR Part 228, must use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, respectively (see table 1, section 200.9 of Title 6), to measure the volatile content, water content, density, volume of solids, and weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration.

Condition 16: Compliance Demonstration
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.1(b)(4)

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: 001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

For a coating application system which is air dried or forced warm air dried at a temperature up to 90 degrees C, the Table 1 VOC content limit (minus water and excluded



VOC) at application shall be met.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Monitoring Frequency: MONTHLY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration

Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.1(b)(4)

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: 002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Variance: The annual VOC emissions from non compliant coatings shall not exceed than 8 ton/yr.

The facility shall submit any changes to the non compliant coatings listed under process 002, with the coating MSDSs, to the Department. Such changes which meet the Part 201-5.4 criteria may be conducted without prior approval of the Department and shall not require modification of the permit. (However a 30 day prior notice may be required).

On an annual basis, the responsible official shall provide a report to the Department documents compliance with the 8 ton/yr limit. The emissions, total usage of each coating, and any make up solvent usage shall be included in the report.

Any exceedance of the 8 ton/yr limit shall be grounds for the Department to revoke this variance.

This variance expires 5 years after permit issuance.

Monitoring Frequency: MONTHLY



Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 12 calendar month(s).

Condition 18: Compliance Demonstration
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.1(b)(4)

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001
Process: 002

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

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Variance: The source owner must continue to investigate compliance strategies. Such investigation shall include the evaluation of either reformulation, abatement technology or process modification.

A report documenting the investigation shall be submitted quarterly. The report must include:

- 1) The results of and dates of testing or engineering evaluation.
- 2) The paint performance testing results. (Paint performance testing is done at and by the facility for various potential paints sent to there by paint vendors.)

The Department reserves the right to require the source owner to evaluate and implement innovative technology within a time frame established by the Commissioner's representative as per 621.14(a)(4). The permittee may submit a written statement to the Department, giving reasons why the permit should not be modified or requesting a hearing, or both as per 621.14(d).

This variance expires 5 years after permit issuance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2004.



Subsequent reports are due every 3 calendar month(s).

Condition 19: Compliance Demonstration
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 226.2

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: 003

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A person conducting solvent metal cleaning must:

- a. Store solvent in covered containers and transfer or dispose of waste solvent such that less than 20% of the waste solvent (by weight) can evaporate into the atmosphere.
- b. Minimize leaks and fugitive emissions.
- c. Display SOP to minimize VOC emissions.
- e. Maintain solvent consumption records for 5 years.
- f. Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 26: Contaminant List
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 26.1:

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

CAS No: 000107-21-1
Name: 1,2-ETHANEDIOL

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

CAS No: 002807-30-9
Name: 2-PROPOXY ETHANOL

CAS No: 000098-82-8
Name: BENZENE, (1-METHYLETHYL)

CAS No: 068186-90-3
Name: CI PIGMENT BROWN 24

CAS No: 000111-46-6
Name: ETHANOL, 2,2'-OXYBIS-

CAS No: 000111-90-0
Name: ETHANOL, 2- (2-ETHOXYETHOXY)

CAS No: 000112-34-5
Name: ETHANOL, 2-(2-BUTOXYETHOXY)-

CAS No: 000100-41-4
Name: ETHYLBENZENE

CAS No: 000050-00-0
Name: FORMALDEHYDE

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

CAS No: 007439-92-1
Name: LEAD

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

CAS No: 000078-93-3
Name: METHYL ETHYL KETONE

CAS No: 0NY075-00-0



Name: PARTICULATES

CAS No: 000100-42-5

Name: STYRENE

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 0NY998-00-0

Name: VOC

CAS No: 001330-20-7

Name: XYLENE, M, O & P MIXT.

Condition 27: Unavoidable noncompliance and violations
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-1.4

Item 27.1:

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 superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

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



and the air contaminants emitted.

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

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

Condition 28: Emission Unit Definition
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 28.1(From Mod 2):

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

Emission Unit: 0-00001

Emission Unit Description:

Emission Unit 0-00001 consists of coating operations for metal reels including: Solvent Wipe Cleaning (EP 05SSA, 05SSB, 05SSC, and 05SSD) Spray Painting (0003A, 0003B, 05SPA, 05SPB, 05SPC, 05SPD) Oven Curing (05SO1A and 05SO1B). Information for 05SPD and 05SSD follows as they are new sources. 05SO1 is changed to 05SO1A and the facility is adding an exempt source 05SO1B.

Building(s): 15
22
22A
5S

Condition 29: Air pollution prohibited
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2

Item 29.1:

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 30: Emission Point Definition By Emission Unit
Effective between the dates of 03/12/2004 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 30.1(From Mod 2):

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

Emission Unit: 0-00001

Emission Point: 0003A

Height (ft.): 12 Diameter (in.): 34
 NYTMN (km.): 4701.7 NYTME (km.): 578.7 Building: 15

Emission Point: 0003B

Height (ft.): 12 Diameter (in.): 34
 NYTMN (km.): 4701.7 NYTME (km.): 578.7 Building: 15

Emission Point: 05SO1

Height (ft.): 20 Diameter (in.): 12
 NYTMN (km.): 4701.7 NYTME (km.): 578.7 Building: 22

Emission Point: 05SPA

Height (ft.): 38 Diameter (in.): 34
 NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Emission Point: 05SPB

Height (ft.): 38 Diameter (in.): 34
 NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Emission Point: 05SPC

Height (ft.): 38 Diameter (in.): 34
 NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Emission Point: 05SPD

Height (ft.): 38 Diameter (in.): 34
 NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Emission Point: 05SSD

Height (ft.): 31 Diameter (in.): 24
 NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Emission Point: 05BWE

Height (ft.): 17 Diameter (in.): 16
 NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Emission Point: 05S01

Height (ft.): 22 Diameter (in.): 12
 NYTMN (km.): 4701.7 NYTME (km.): 578.7 Building: 5S

Emission Point: 05SSA

Height (ft.): 31 Diameter (in.): 24



NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Emission Point: 05SSB
Height (ft.): 31 Diameter (in.): 24
NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Emission Point: 05SSC
Height (ft.): 31 Diameter (in.): 24
NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

**Condition 31: Process Definition By Emission Unit
Effective between the dates of 03/12/2004 and Permit Expiration Date**

Applicable State Requirement:6NYCRR 201-5

Item 31.1(From Mod 2):

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

Emission Unit: 0-00001
Process: 001
Process Description:
COMPLIANT COATING (COATINGS WITH LESS THEN
3.5 LB/GAL VOC).

Emission Source/Control: 00003 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0003A - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0003I - Process

Emission Source/Control: 0SPAI - Process

Emission Source/Control: 0SPBI - Process

Emission Source/Control: 0SPCI - Process

Item 31.2(From Mod 2):

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

Emission Unit: 0-00001
Process: 002
Process Description:
Non compliant coating, including using the following
coatings:
1. ICI Devoe 4310-0900
2. ICI Devoe 4318-0700
3. Dupont Centari acrylic enamel tints (single MSDS)

Emission Source/Control: 00003 - Control
Control Type: FABRIC FILTER



Emission Source/Control: 0003A - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0003I - Process

Emission Source/Control: 0SPAI - Process

Emission Source/Control: 0SPBI - Process

Emission Source/Control: 0SPCI - Process

Item 31.3(From Mod 0):

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

Emission Unit: 0-00001

Process: 003

Process Description:

Wipe cleaning of metal parts (Including wipe cleaning of
oversize reels. Oversize reel wipe cleaning has no source
or emission point--it exhausts inside building.)

Emission Source/Control: 00SSA - Process

Emission Source/Control: 00SSB - Process

Emission Source/Control: 00SSC - Process

Item 31.4(From Mod 0):

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

Emission Unit: 0-00001

Process: 004

Process Description: curing

Emission Source/Control: 00SO1 - Process

Item 31.5(From Mod 0):

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

Emission Unit: 0-00001

Process: 005

Process Description:

Plasma cutter is utilized to cut steel, stainless steel
and aluminum.

Emission Source/Control: 05BWE - Control

Control Type: FABRIC FILTER

Emission Source/Control: 5BWEI - Process

**Condition 32: Emissions from new emission sources and/or modifications
Effective between the dates of 03/12/2004 and Permit Expiration Date**



Applicable State Requirement: 6NYCRR 212.4(a)

Item 32.1:

This Condition applies to Emission Unit: 0-00001

Item 32.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

New York State Department of Environmental Conservation

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

