



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-3070-00035/00045
Mod 0 Effective Date: 05/21/2003 Expiration Date: No expiration date.
Mod 1 Effective Date: 07/25/2007 Expiration Date: No expiration date.
Mod 2 Effective Date: 10/09/2007 Expiration Date: No expiration date.
Mod 3 Effective Date: 02/11/2011 Expiration Date: No expiration date.
Mod 4 Effective Date: 02/11/2011 Expiration Date: No expiration date.

Permit Issued To: TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
2 HALSEY RD
WHITESBORO, NY 13492

Facility: TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
2 HALSEY RD
WHITESBORO, NY 13492

Contact: MICHAEL COLLINS
TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
2 HALSEY RD
WHITESBORO, NY 13492
(315) 768-8754

Description:

The purpose of this modification was to add the Subpart HHHHHH non-applicable language and to remove the older and unused "Blue Etch" Source and it's associated emission point #00044. Emission points 00026 and 00038, stacks for old baghouses, were also removed in this modification.

New York State Department of Environmental Conservation
Facility DEC ID: 6307000035



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: PATRICK M CLEAREY
 NYSDEC - REG 6
 207 GENESEE ST
 UTICA, NY 13501

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 or revocations by the Department
 - Permit Modifications, Suspensions and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal
 - REGION 6 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 1-1: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:

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

GENERAL CONDITIONS FOR PERMITS FOR THE CONSTRUCTION AND OPERATION OF FACILITIES



Applicable State Requirement: 6 NYCRR 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 1-2: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-2.1:

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

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

Condition 3-1: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 3-1.1:

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



Condition 4: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6 NYCRR 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 6 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.5 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 6 Headquarters
Division of Environmental Permits
State Office Building, 317 Washington Street
Watertown, NY 13601-3787
(315) 785-2245

Condition 1-3: Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 1-3.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 6 Sub-office
Division of Environmental Permits
State Office Building, 207 Genesee Street
Utica, NY 13501-2885
(315) 793-2555

New York State Department of Environmental Conservation

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
2 HALSEY RD
WHITESBORO, NY 13492

Facility: TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
2 HALSEY RD
WHITESBORO, NY 13492

Authorized Activity By Standard Industrial Classification Code:
3463 - NONFERROUS FORGINGS
3511 - TURBINES AND TURBINE GENERATOR
3724 - AIRCRAFT ENGINES & ENGINE PART

Mod 0 Permit Effective Date: 05/21/2003
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 07/25/2007
date.

Permit Expiration Date: No expiration

Mod 2 Permit Effective Date: 10/09/2007
date.

Permit Expiration Date: No expiration

Mod 3 Permit Effective Date: 02/11/2011
date.

Permit Expiration Date: No expiration

Mod 4 Permit Effective Date: 02/11/2011
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-2 6 NYCRR 211.3: Visible Emissions Limited
- 1 6 NYCRR 201-3.3 (c): Trivial Activities - (c)(52)
- 2 6 NYCRR 201-3.3 (c): Trivial Activities: (c)(53)
- 3-1 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 1-1 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 3-2 6 NYCRR 201-7.2: Facility Permissible Emissions
- *3-3 6 NYCRR 201-7.2: Capping Monitoring Condition
- 3-4 6 NYCRR 212.4 (c): Compliance Demonstration
- 6 6 NYCRR 212.5 (a): Emissions from two or more devices through one emission point
- 1-6 6 NYCRR 212.6 (a): Compliance Demonstration
- 1-7 6 NYCRR 228-1.1 (e) (7): Exceptions for aerospace coatings
- 1-8 6 NYCRR 228-1.2 (b) (35): Compliance Demonstration

Emission Unit Level

EU=1-SPRAY

- 1-9 6 NYCRR 228-1.1 (d): Will remain subject to Part 228.
- 1-10 6 NYCRR 228-1.4: Compliance Demonstration
- 1-11 6 NYCRR 228-1.5 (a): Compliance Demonstration
- 1-12 6 NYCRR 228-1.5 (b): Use of Methods 311 or 24.
- 1-13 6 NYCRR 228-1.5 (d): Department access to obtain samples.
- 1-14 6 NYCRR 228-1.10: Compliance Demonstration

EU=1-SPRAY,Proc=SPR

- 1-15 6 NYCRR 228-1.7: Compliance Demonstration

EU=2-ACIDS,Proc=202,ES=SCR01

- 1-16 6 NYCRR 212.4 (a): Compliance Demonstration

EU=2-ACIDS,Proc=203,ES=SCR02

- 1-17 6 NYCRR 212.4 (a): Compliance Demonstration

EU=2-ACIDS,Proc=204,ES=SCR03

- 1-18 6 NYCRR 212.4 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 23 ECL 19-0301: Contaminant List
- 3-5 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 24 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 25 6 NYCRR Subpart 201-5: Emission Unit Definition
- 3-6 6 NYCRR 211.2: Air pollution prohibited
- 3-7 6 NYCRR 211.2: Compliance Demonstration

Emission Unit Level

- 27 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 28 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.



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 1-2: Visible Emissions Limited
Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 211.3

Item 1-2.1:

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

Condition 1: Trivial Activities - (c)(52)
Effective between the dates of 05/21/2003 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-3.3 (c)

Item 1.1:

The following activity is trivial and is exempt from permitting requirements and does not need to be included in the Title V facility permit application: Hand held or manually operated equipment used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding or turning ceramic art work, ceramic precision parts, leather, metal parts, plastics, fiberboard, masonry, carbon, glass, graphite, wood or rubber.

Condition 2: Trivial Activities: (c)(53)
Effective between the dates of 05/21/2003 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-3.3 (c)

Item 2.1:

The following activity is trivial and is exempt from permitting requirements and does not need to be included in the Title V facility permit application: Manual surface coating/painting processes which exclusively use brushed, rollers or aerosol cans.

Condition 3-1: Non Applicable requirements
Effective between the dates of 02/11/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-6.5 (g)

Item 3-1.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

(From Mod 3) 40 CFR Part 63, Subpart HHHHHH



Reason: Specifically for the purposes of Subpart HHHHHH applicability, the spray-applied coatings that are utilized at TECT do not meet the description of "coatings" per 63.11180. The coatings in use at TECT are temporary protective maskants, whose purpose is to both lubricate the heated turbine blade prior to forging as well as to isolate this titanium blade from atmospheric oxygen. These maskants are repeatedly applied, chemically removed and re-applied, therefore - temporary. The coating description (63.11180) specifically excludes maskants, lubricants and temporary protective coatings. NOTE: For 6 NYCRR 228 applicability, these maskants ARE coatings.

Condition 1-1: Non Applicable requirements
Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-6.5 (g)

Item 1-1.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

(From Mod 1) 40 CFR Part 63, Subpart GG

Reason: 40 CFR 63 Subpart GG is not applicable to TECT Utica. No individual HAP PTE neither meets nor exceeds 10 tons/yr.

(NOTE: Lead Oxide, a HAP component of several maskants, is loosely believed to NOT be emitted in air discharges.)

Similarly, all aggregated HAP PTE neither meets nor exceeds 25 tons/yr. In addition, the TECT maskant-usage purpose is for forging protection, not chemical milling protection.

Condition 3-2: Facility Permissible Emissions
Effective between the dates of 02/11/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 3-2.1:

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 (From Mod 3) PTE: 98,000 pounds
per year

Name: VOC

Condition 3-3: Capping Monitoring Condition
Effective between the dates of 02/11/2011 and Permit Expiration Date



Applicable Federal Requirement:6 NYCRR 201-7.2

Item 3-3.1:

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:

6 NYCRR 201-6.1 (a)

Item 3-3.2:

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

Item 3-3.3:

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 3-3.4:

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 3-3.5:

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 3-3.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 3-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility owner shall ensure that emissions of Volatile Organic Compounds (VOC), including those from permitted, exempt, and trivial sources, remain less than 98,000 pounds during any consecutive 12-month period.



TECT shall maintain records that verify the facility's monthly VOC emissions. These records must be maintained at the facility for a minimum five-year period.

Reports shall be submitted annually and in a format acceptable to the Department's representative, which document that the facility's VOC emissions during any consecutive 365 day period were less than 98,000 pounds. Each annual monitoring report must include information that documents the VOC emissions from each emission source at the facility, including fuel usage and also exempt and trivial activities. The report shall also include all emission factors and other data used in calculating the monthly VOC emissions.

The Department may require stack testing to verify VOC emissions; in such an event, Reference Method 25A shall be utilized. Any noncompliance with the VOC emission limit in this condition must be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: VOC
Upper Permit Limit: 98,000 pounds per year
Reference Test Method: EPA Reference Method 25A
Monitoring Frequency: MONTHLY
Averaging Method: 12-month total, rolled monthly
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2012.
Subsequent reports are due every 12 calendar month(s).

Condition 3-4: Compliance Demonstration
Effective between the dates of 02/11/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 3-4.1:

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

Emission Unit: 2-ACIDS	Emission Point: 00003
Emission Unit: 2-ACIDS	Emission Point: 00043
Emission Unit: 2-ACIDS	Emission Point: 00044
Emission Unit: 2-ACIDS	Emission Point: 00046
Emission Unit: 2-ACIDS	Emission Point: 00050



Emission Unit: 2-ACIDS	Emission Point: 00053
Emission Unit: 2-ACIDS	Emission Point: 00054
Emission Unit: 3-MANUF	Emission Point: 00004
Emission Unit: 3-MANUF	Emission Point: 00013

Item 3-4.2:

Compliance Demonstration shall include the following monitoring:

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

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. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.



determine whether or not visible emissions are present and/or to what extent, similar to EPA Reference Method 22. Visible emission observations shall not consider those due to water vapor that may be present in exhaust gas. Observations shall be made once per day while the source is operating. These observations shall be recorded in a log book and made available to the Department upon request.

If visible emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified Method 9 visible emission test
- 3) Notify the NYSDEC
- 4) If the Method 9 test determines that the opacity is less than 20%, then an appropriate log entry of "clear" or "very minimal" shall be recorded.
- 5) If the RM9 certified observer detects opacity greater than 20%, then facility shall make such an entry in the log.
- 6) Severe weather conditions may impede meaningful observations

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Reference Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 1-7: Exceptions for aerospace coatings
Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 228-1.1 (e) (7)

Item 1-7.1:

The requirements of Part 228 do not apply to aerospace coatings which are utilized for pretreatment, adhesive bonding primers, flight testing, fuel tanks, electric/radiation effects, space vehicles and temporary mechanical maskant/high temperature heat treatment

Condition 1-8: Compliance Demonstration
Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 228-1.2 (b) (35)

Item 1-8.1:

New York State Department of Environmental Conservation

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For all surface coatings subject to 6NYCRR Part 228, the VOC content (as applied, minus water and exempt VOC), must be less than or equal to the limit specified in Table 1 or Table 2 for the respective surface that is coated.

The VOC content of a coating, as applied, shall be calculated as follows:

$$(VOC)_a = [(Wv)_a - (Ww)_a - (We)_a] / [1 - \{ (Vw)_a + (Ve)_a \}]$$

Where:

(VOC)_a = VOC content of a coating, as applied, expressed as pounds of VOC per gallon of coating minus water and excluded VOC

(Wv)_a = The pounds of total volatiles per gallon of an as applied coating

(Ww)_a = The pounds of water per gallon of an as applied coating

(We)_a = The pounds of excluded VOC per gallon of an as applied coating

(Vw)_a = The gallons of water per gallon of an as applied coating

(Ve)_a = The gallons of excluded VOC per gallon of an as applied coating

Reference Test Method: EPA Method 24

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 1-9: Will remain subject to Part 228.
Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228-1.1 (d)

Item 1-9.1:

This Condition applies to Emission Unit: 1-SPRAY



Item 1-9.2:

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 1-10: Compliance Demonstration
Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228-1.4

Item 1-10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SPRAY

Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any process emission source subject to 6 NYCRR 228. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Compliance with the 20% opacity standard shall be estimated (in surrogate) by the permittee's daily observation of the outlet of the emission source to determine whether or not visible emissions are present and/or to what extent, similar to EPA Reference Method 22. Visible emission observations shall not consider those due to water vapor that may be present in exhaust gas. Observations shall made once per day while the source is operating. These observations shall be recorded in a log book and made available to the Department upon request.

If visible emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified Method 9 visible emission test
- 3) Notify the NYSDEC
- 4) If the Method 9 test determines that the opacity is less than 20%, then an appropriate log entry of "clear" or "very minimal" shall be recorded.
- 5) If the RM9 certified observer detects opacity greater



than 20%, then facility shall make such an entry in the log.

6) Severe weather conditions may impede meaningful observations

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Reference Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 1-11: Compliance Demonstration

Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228-1.5 (a)

Item 1-11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SPRAY

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-11.2:

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.

New York State Department of Environmental Conservation

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



Monitoring Frequency: CONTINUOUS

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-12: Use of Methods 311 or 24.

Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228-1.5 (b)

Item 1-12.1:

This Condition applies to Emission Unit: 1-SPRAY

Item 1-12.2:

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 1-13: Department access to obtain samples.

Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228-1.5 (d)

Item 1-13.1:

This Condition applies to Emission Unit: 1-SPRAY

Item 1-13.2:

Representatives of the Department must be permitted during reasonable business hours, to obtain coating samples for the purpose of determining compliance with 6NYCRR Part 228.

Condition 1-14: Compliance Demonstration

Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228-1.10

Item 1-14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SPRAY

Item 1-14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Part 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.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

New York State Department of Environmental Conservation

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



Condition 1-15: Compliance Demonstration

Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228-1.7

Item 1-15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SPRAY

Process: SPR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Miscellaneous metal parts and product coating lines utilizing extreme performance coatings may contain a maximum of 3.5 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: EXTREME PERFORMANCE COATING - MISCELLANEOUS METAL PARTS

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: Method 24 (40 CFR 60)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 1-16: Compliance Demonstration

Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 1-16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ACIDS

Process: 202

Emission Source: SCR01

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



CAS No: 007647-01-0 HYDROGEN CHLORIDE
CAS No: 007697-37-2 NITRIC ACID

Item 1-16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The Sly packed-bed scrubber shall be operated within the confines of the Operation and Maintenance Plan (OMP), an amendment to this permit. OMP operation is intended to ensure that this device provides the facility-stated 70% acid control efficiency of the Final Audit Etch Line. The pressure drop shall be monitored and recorded weekly. Any exceedence shall require immediate investigation to determine the root cause and to initiate follow-up corrective action.

Manufacturer Name/Model Number: Sly Packed-Bed Scrubber (SCR01)

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1.0 inches of water

Upper Permit Limit: 3.0 inches of water

Monitoring Frequency: WEEKLY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 1-17: Compliance Demonstration

Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 1-17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ACIDS

Process: 203

Emission Source: SCR02

Regulated Contaminant(s):

CAS No: 007664-39-3

HYDROGEN FLUORIDE

CAS No: 007697-37-2

NITRIC ACID

Item 1-17.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



The Viron packed-bed scrubber shall be operated within the confines of the Operation and Maintenance Plan (OMP), an amendment to this permit. OMP operation is intended to ensure that this device provides the facility-stated 80% acid control efficiency of the Old Chem Mill Line and Manual/Small-Etch Line. The pressure drop shall be monitored and recorded weekly. Any exceedence shall require immediate investigation to determine the root cause and to initiate follow-up corrective action.

Manufacturer Name/Model Number: Viron Packed-Bed Scrubber (SCR02)

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1.0 inches of water

Upper Permit Limit: 3.0 inches of water

Monitoring Frequency: WEEKLY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 1-18: Compliance Demonstration

Effective between the dates of 07/25/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 1-18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ACIDS

Process: 204

Emission Source: SCR03

Regulated Contaminant(s):

CAS No: 007664-39-3

HYDROGEN FLUORIDE

CAS No: 007697-37-2

NITRIC ACID

Item 1-18.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The VanAire packed-bed scrubber shall be operated within the confines of the Operation and Maintenance Plan (OMP), an amendment to this permit. OMP operation is intended to ensure that this device provides the facility-stated 90% acid control efficiency of the New Chem Mill Line. The pressure drop shall be monitored and recorded weekly. Any exceedence shall require immediate investigation to determine the root cause and to initiate follow-up corrective action.

New York State Department of Environmental Conservation

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



Manufacturer Name/Model Number: VanAire Packed-Bed Scrubber (SCR01)

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1.0 inches of water

Upper Permit Limit: 3.0 inches of water

Monitoring Frequency: WEEKLY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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



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

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

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 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 23: Contaminant List

Effective between the dates of 05/21/2003 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 23.1:

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

CAS No: 007647-01-0
Name: HYDROGEN CHLORIDE

CAS No: 007664-39-3
Name: HYDROGEN FLUORIDE

CAS No: 007697-37-2
Name: NITRIC ACID

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

Condition 3-5: Unavoidable noncompliance and violations

Effective between the dates of 02/11/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 3-5.1:

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 24: Unavoidable noncompliance and violations
Effective between the dates of 05/21/2003 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 24.1:

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 25: Emission Unit Definition
Effective between the dates of 05/21/2003 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1(From Mod 3):

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

Emission Unit: 1-SPRAY

Emission Unit Description:

This emission unit consists of three spray painting booths and one dip-coating bench. Maskant coatings are applied by three robots, one per booth. Workpieces are turbine blades which are suspended from conveyors as they move through the booths. Blades are of both aerospace and land-based varieties. Booths utilize particulate filters that are 95% efficient. Dip coating of small numbers of blades is performed by hand and done on a benchtop. Involved processes are 102 & SPR

Building(s): 3

Item 25.2(From Mod 3):

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

Emission Unit: 2-ACIDS

Emission Unit Description:

New York State Department of Environmental Conservation

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



This emission unit consists of five acid-etching operations. Involved processes: 202, 203, 204, 205 & 206

- Blue Etch Anodizing Line: No control, EP00054
- Virgo Etch Operation: No control, EP00043 & EP00053
- Final Audit Etch: Sly Scrubber @ 70%, EP00003
- Old Chem Mill Etch & Manual/Small Etch: Viron Scrubber @ 80%, EP00046
- New Chem Mill Etch: VanAire Scrubber @ 90%, EP00050

Building(s): 1
3

Item 25.3(From Mod 3):

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

Emission Unit: 3-MANUF

Emission Unit Description:

This emission unit consists of machining operations which emit particulates.

- Process 301 is EDM machining, no control, EP00004
- Process 304 is cutting of bar stock (Savage Saw), Rotoclon #6, EP00013

Building(s): 1
2
3

Condition 3-6: Air pollution prohibited
Effective between the dates of 02/11/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 3-6.1:

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

Condition 3-7: Compliance Demonstration
Effective between the dates of 02/11/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 3-7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 3-7.2:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint phone line available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.
5. Report in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2012.

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

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

**Condition 27: Emission Point Definition By Emission Unit
Effective between the dates of 05/21/2003 and Permit Expiration Date**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 27.1(From Mod 3):

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

Emission Unit: 1-SPRAY

Emission Point: 00040

Height (ft.): 28

Diameter (in.): 39

NYTMN (km.): 4772.899

NYTME (km.): 472.518

Building: 3

Emission Point: 00041

Height (ft.): 28

Diameter (in.): 39

NYTMN (km.): 4772.909

NYTME (km.): 472.525

Building: 3

Item 27.2(From Mod 3):

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

Emission Unit: 2-ACIDS



Emission Point: 00003
Height (ft.): 36 Diameter (in.): 20
NYTMN (km.): 4772.882 NYTME (km.): 472.468 Building: 1

Emission Point: 00043
Height (ft.): 26 Diameter (in.): 31
NYTMN (km.): 4772.917 NYTME (km.): 472.535 Building: 3

Emission Point: 00046
Height (ft.): 34 Diameter (in.): 28
NYTMN (km.): 4772.881 NYTME (km.): 472.561 Building: 3

Emission Point: 00050
Height (ft.): 34 Diameter (in.): 20
NYTMN (km.): 4772.888 NYTME (km.): 472.572 Building: 3

Emission Point: 00053
Height (ft.): 26 Diameter (in.): 31
NYTMN (km.): 4772.914 NYTME (km.): 472.54 Building: 3

Emission Point: 00054
Height (ft.): 29 Length (in.): 18 Width (in.): 14
NYTMN (km.): 4772.901 NYTME (km.): 472.559 Building: 3

Item 27.3(From Mod 3):

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

Emission Unit: 3-MANUF

Emission Point: 00004
Height (ft.): 36 Diameter (in.): 16
NYTMN (km.): 4772.911 NYTME (km.): 472.468 Building: 2

Emission Point: 00013
Height (ft.): 24 Diameter (in.): 9
NYTMN (km.): 4772.924 NYTME (km.): 472.514 Building: 3

**Condition 28: Process Definition By Emission Unit
Effective between the dates of 05/21/2003 and Permit Expiration Date**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 28.1(From Mod 3):

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

Emission Unit: 1-SPRAY
Process: 102 Source Classification Code: 3-09-011-99
Process Description:
This process consists of the maskant coating of
"aerospace" (aircraft jet engine ONLY) turbine blades.
Such coating is performed in three spray booths and on one



dip-coating bench. Robots apply these maskants in the spray booths and dip-coating is done by hand. Per 6NYCRR228-1.1(e)(7), Part 228 does not apply to the usage of a "temporary mechanical maskant " coating on an aerospace part. Therefore the VOC-content limitations of Part 228 Tables 1 & 2 are NOT applicable to the coating of these aerospace blades. Facility shall maintain records which conclusively differentiate aerospace turbine blades from land-based blades and shall maintain constant readiness to produce such a record to NYSDEC at any time.

Emission Source/Control: FTR01 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: BTH#1 - Process

Emission Source/Control: BTH#2 - Process

Emission Source/Control: BTH#3 - Process

Emission Source/Control: DIPBH - Process

Item 28.2(From Mod 3):

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

Emission Unit: 1-SPRAY

Process: SPR

Source Classification Code: 4-02-001-01

Process Description:

This process consists of the maskant coating of "land-based" turbine blades. Land-based blades shall constitute ALL turbine blades that are not produced for aerospace (aircraft) usage. Such coating is performed in three spray booths and on one dip-coating bench. Robots spray the maskants in the spray booths and dip-coating is done by hand. The usage of maskant coatings on land-based blades is permissible per 6NYCRR228-1.7 Table 1 and falls into the category "Coating lines for miscellaneous metal parts and products" and then "Extreme performance coatings designed for harsh exposure or extreme environmental conditions". This workpiece classification dictates that the coating VOC content shall not exceed 3.5 lb/(gallon less water and exempt solvents).

Emission Source/Control: FTR01 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: BTH#1 - Process

Emission Source/Control: BTH#2 - Process

Emission Source/Control: BTH#3 - Process



Emission Source/Control: DIPBH - Process

Item 28.3(From Mod 3):

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

Emission Unit: 2-ACIDS
Process: 202 Source Classification Code: 3-09-011-02
Process Description:
Final Audit Etch: Turbine blades are cleaned with acids prior to final inspection, controlled w/ Sly scrubber (SCR01) @ 70% efficiency and exhausted to EP00003. Scrubber is inside Bldg #1. Emissions are hydrochloric acid (HAP) and nitric acid.

Emission Source/Control: SCR01 - Control
Control Type: PACKED GAS ABSORPTION SYSTEM, GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: FINAL - Process

Item 28.4(From Mod 3):

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

Emission Unit: 2-ACIDS
Process: 203 Source Classification Code: 3-09-011-02
Process Description:
Old Chemical Milling Line & Manual/Small Chemical Milling Line: Turbine blades are physically reduced in size (metal removal) via acid etching, controlled w/ Viron packed-bed scrubber (SCR02) @ 80% efficiency and exhausted to EP00046. Scrubber is outside and east of Bldg #3. Emissions are hydrofluoric acid (HAP) and nitric acid.

Emission Source/Control: SCR02 - Control
Control Type: PACKED GAS ABSORPTION SYSTEM, GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: OLDCM - Process

Item 28.5(From Mod 3):

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

Emission Unit: 2-ACIDS
Process: 204 Source Classification Code: 3-16-130-01
Process Description:
New Chemical Milling Line: Turbine blades are physically reduced in size (metal removal) via acid etching, controlled w/ VanAire packed-bed scrubber (SCR03) @ 90% efficiency and exhausted to EP00050. Scrubber is outside and east of Bldg #3. Emissions are hydrofluoric acid (HAP) and nitric acid.



Emission Source/Control: SCR03 - Control
Control Type: PACKED GAS ABSORPTION SYSTEM, GAS
SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: NEWCM - Process

Item 28.6(From Mod 3):

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

Emission Unit: 2-ACIDS
Process: 205 Source Classification Code: 3-09-011-03
Process Description:
This process consists of the Blue Etch Anodizing Operation: acid and alkaline metal treatments impart a blue tint into turbine blades. This process is comprised of eight tanks attended by one robot. Source BLET2 exhausts through emission point 00054.

Emission Source/Control: BLET2 - Process

Item 28.7(From Mod 3):

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

Emission Unit: 2-ACIDS
Process: 206 Source Classification Code: 3-16-130-01
Process Description:
Virgo Operations: Glass frit maskant coating is removed from turbine blades by an acid etching process after forging operation is completed, no control, exhausts to both EP00043 and EP00053. Emissions are hydrofluoric acid (HAP) and nitric acid.

Emission Source/Control: VIRGO - Process

Item 28.8(From Mod 3):

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

Emission Unit: 3-MANUF
Process: 301 Source Classification Code: 3-04-003-55
Process Description:
This process is a machining operation that is performed by electro-discharge machining (EDM). Metal is removed by electric arc and is a wet operation. Hoods, a duct network and a fan collect and remove emissions through a roof stack. EDM emissions are metal and/or coolant particulates.

Emission Source/Control: 00EDM - Process

Item 28.9(From Mod 3):

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



Emission Unit: 3-MANUF

Process: 304

Source Classification Code: 3-12-999-99

Process Description:

This process consists of the operation of the "Savage NC Saw". This machine tool cuts bar stock to size. Unit exhausts through Rotoclone #6 (a control cyclone, located in bldg #3) and particulate emissions exhaust to EP00013, which penetrates the roof.

Emission Source/Control: RCL06 - Control

Control Type: WET ROTOCLONE

Emission Source/Control: SAW01 - Process

