



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 6-3070-00035/00045  
Effective Date: 02/02/2015 Expiration Date: 02/01/2025

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:  
This Renewal is being conducted to create the new 10 year expiration date and to re-number the Part 228 regulations.

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

Permit Administrator: LAWRENCE R AMBEAU  
NYSDEC - REGION 6  
317 WASHINGTON ST  
WATERTOWN, NY 13601

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

**Facility Level**

- Submission of application for permit modification or renewal-REGION 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 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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



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

**Item 4.1:**

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

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

**\*\*\*\* Facility Level \*\*\*\***

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

**Item 5.1:**

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

NYSDEC Regional Permit Administrator  
Region 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  
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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

Permit Effective Date: 02/02/2015

Permit Expiration Date: 02/01/2025



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 201-3.3 (c): Trivial Activities - (c)(52)
- 2 6 NYCRR 201-3.3 (c): Trivial Activities: (c)(53)
- 3 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- \*4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 5 6 NYCRR 211.1: Air pollution prohibited
- 6 6 NYCRR 212.4 (c): Compliance Demonstration
- 7 6 NYCRR 212.5 (a): Emissions from two or more devices through one emission point
- 8 6 NYCRR 212.6 (a): Compliance Demonstration
- 9 6 NYCRR 228-1.1 (a) (3): Once in always in
- 10 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 11 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 12 6 NYCRR 228-1.3 (e) (2): Compliance Demonstration
- 13 6 NYCRR 228-1.4 (b) (4) (ii): Compliance Demonstration
- 14 6 NYCRR 228-1.4 (e) (3): Class E coating line - Aerospace coatings

#### Emission Unit Level

##### EU=1-SPRAY

- 15 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration

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

- 16 6 NYCRR 212.4 (a): Compliance Demonstration

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

- 17 6 NYCRR 212.4 (a): Compliance Demonstration

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

- 18 6 NYCRR 212.4 (a): Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 19 ECL 19-0301: Contaminant List
- 20 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 21 6 NYCRR Subpart 201-5: Emission Unit Definition
- 22 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 23 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 24 6 NYCRR 211.2: Visible Emissions Limited
- 25 6 NYCRR 211.2: Compliance Demonstration
- 26 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.



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

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

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

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

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

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

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

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

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

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



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

**Item K: Open Fires Prohibitions - 6 NYCRR 215.2**  
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item L: Permit Exclusion - ECL 19-0305**  
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)**  
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1: Trivial Activities - (c)(52)**



Effective between the dates of 02/02/2015 and 02/01/2025

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, sand blasting 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 02/02/2015 and 02/01/2025

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: Facility Permissible Emissions**

Effective between the dates of 02/02/2015 and 02/01/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

**Item 3.1:**

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

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

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

PTE: 98,000 pounds per year

**Condition 4: Capping Monitoring Condition**

Effective between the dates of 02/02/2015 and 02/01/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

**Item 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:

6 NYCRR 201-6.1 (a)

**Item 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 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 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 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 4.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0      VOC

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

CAP:

Facility owner shall ensure that the facility-wide emissions of volatile organic compounds (VOC), including those from permitted, exempt and trivial sources, remain less than 98,000 pounds during any consecutive 365 day period. This 98,000 pound VOC cap enables TECT to avoid the applicability of 6 NYCRR 228-1 on aerospace blades, however TECT must comply with Part 228-1.3 (General Requirements). On land-based blades (Misc Metal Parts category), TECT is still held to the 3.5 lbs/gal VOC content limit.

RECORDS:

Facility owner shall maintain records that verify the facility's monthly VOC emissions. These records shall be maintained at the facility for a minimum five year period. Reports will be submitted annually, in a format acceptable to the Department, which document that the facility's VOC emissions during any consecutive 365 day period were less than 98,000 pounds.



**REPORTS:**

The annual monitoring report shall include information that documents the VOC emissions from each emission source at the facility, including exempt and trivial activities. The report shall also include all emission factors and other data used in calculating the monthly VOC emissions. The form "Annual Capping Certification" is required.

**NONCOMPLIANCE:**

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: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 12 calendar month(s).

**Condition 5: Air pollution prohibited**  
**Effective between the dates of 02/02/2015 and 02/01/2025**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 5.1:**

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 6: Compliance Demonstration**  
**Effective between the dates of 02/02/2015 and 02/01/2025**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 6.1:**

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: 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 6.2:**

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





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 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 1/30/2016.  
Subsequent reports are due every 12 calendar month(s).

**Condition 9: Once in always in**  
**Effective between the dates of 02/02/2015 and 02/01/2025**

**Applicable Federal Requirement: 6 NYCRR 228-1.1 (a) (3)**

**Item 9.1:**

Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 02/02/2015 and 02/01/2025**



**Applicable Federal Requirement:6 NYCRR 228-1.3 (a)**

**Item 10.1:**

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

Emission Unit: 1-SPRAY Emission Point: 00040

Emission Unit: 1-SPRAY Emission Point: 00041

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

**Item 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 having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, excepting only the emission of uncombined water, in this case - the emission points (stacks) for a coating operation. The permittee will conduct DAILY observations of visible emissions from the emission points to which this condition applies. The observations shall be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Incident weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.

If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions above those



that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the Annual Monitoring Report required of all permittees shall include a copy of this log.

**\*\* NOTE \*\*** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: Observe plume daily, perform RM9 at NYSDEC request  
Monitoring Frequency: DAILY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 22)  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 12 calendar month(s).

**Condition 11: Compliance Demonstration**  
**Effective between the dates of 02/02/2015 and 02/01/2025**

**Applicable Federal Requirement:6 NYCRR 228-1.3 (d)**

**Item 11.1:**

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

Emission Unit: 1-SPRAY  
Process: 102

Emission Unit: 1-SPRAY  
Process: SPR

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:

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

Subpart 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) clean hand held spray guns 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

**New York State Department of Environmental Conservation**

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



information:

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

Monitoring Frequency: WEEKLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

**Condition 12: Compliance Demonstration**  
**Effective between the dates of 02/02/2015 and 02/01/2025**

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (e) (2)**

**Item 12.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-SPRAY

Process: 102

Emission Unit: 1-SPRAY

Process: SPR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility containing a coating line (other than a class A coating line) may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4 ; provided such use is recorded on an as used basis and maintained at the facility for a period of five years.

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 1/30/2016.

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

**Condition 13: Compliance Demonstration**



Effective between the dates of 02/02/2015 and 02/01/2025

Applicable Federal Requirement:6 NYCRR 228-1.4 (b) (4) (ii)

**Item 13.1:**

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

Emission Unit: 1-SPRAY  
Process: SPR

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

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The VOC content of coatings that are applied to land-based blades is limited to 3.5 pounds of VOC per gallon of coating less water and less exempt VOC. Land based blades fall into the category "Class B Coating Line - Miscellaneous Metal Parts" and Table B4 dictates that 3.5 lbs/gal is the regulatory limit for "Pretreatment Coatings" that are either air dried or bake dried.

Parameter Monitored: VOC CONTENT  
Upper Permit Limit: 3.5 pounds per gallon  
Reference Test Method: EPA Reference Method 24  
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE  
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 1/30/2016.  
Subsequent reports are due every 12 calendar month(s).

**Condition 14:** Class E coating line - Aerospace coatings  
Effective between the dates of 02/02/2015 and 02/01/2025

Applicable Federal Requirement:6 NYCRR 228-1.4 (e) (3)

**Item 14.1: 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 are not subject to the VOC limits of section 6 NYCRR 228-1.4(e).**



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

**Condition 15: Compliance Demonstration**  
Effective between the dates of 02/02/2015 and 02/01/2025

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SPRAY

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**Condition 16: Compliance Demonstration**  
Effective between the dates of 02/02/2015 and 02/01/2025

**Applicable Federal Requirement:6 NYCRR 212.4 (a)**

**Item 16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ACIDS

Process: 202

Emission Source: SCR01

Regulated Contaminant(s):

CAS No: 007647-01-0

HYDROGEN CHLORIDE

CAS No: 007697-37-2

NITRIC ACID

**Item 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 1/30/2016.

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

**Condition 17: Compliance Demonstration**  
Effective between the dates of 02/02/2015 and 02/01/2025

**Applicable Federal Requirement:6 NYCRR 212.4 (a)**

**Item 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 17.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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 1/30/2016.

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

**Condition 18: Compliance Demonstration**  
**Effective between the dates of 02/02/2015 and 02/01/2025**

**Applicable Federal Requirement: 6 NYCRR 212.4 (a)**

**Item 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 18.2:**

Compliance Demonstration shall include the following monitoring:

**New York State Department of Environmental Conservation**

**Permit ID: 6-3070-00035/00045**

**Facility DEC ID: 630700035**



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.

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 1/30/2016.

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 19: Contaminant List**  
**Effective between the dates of 02/02/2015 and 02/01/2025**





contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

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

**Condition 21: Emission Unit Definition**  
**Effective between the dates of 02/02/2015 and 02/01/2025**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 21.1:**

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 21.2:**

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

Emission Unit: 2-ACIDS

Emission Unit Description:

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 21.3:**

**New York State Department of Environmental Conservation**

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



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), Rotoclone #6, EP00013

NOTE: 40 CFR 63-Subpart WWWW does not apply to TECT. While TECT does abrasive grind nickel parts, this 6W applies to the polishing operations of previously electroplated (parts that were plated with a target HAP).

Building(s): 1  
2  
3

**Condition 22: Renewal deadlines for state facility permits  
Effective between the dates of 02/02/2015 and 02/01/2025**

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

**Item 22.1:**

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

**Condition 23: Compliance Demonstration  
Effective between the dates of 02/02/2015 and 02/01/2025**

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

**Item 23.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 23.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 6  
State Office Building  
317 Washington Ave.

**New York State Department of Environmental Conservation**

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



Watertown, NY 13601

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

**Condition 24: Visible Emissions Limited**  
**Effective between the dates of 02/02/2015 and 02/01/2025**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 24.1:**

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 25: Compliance Demonstration**  
**Effective between the dates of 02/02/2015 and 02/01/2025**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 25.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 25.2:**

Compliance Demonstration shall include the following monitoring:

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 1/30/2016.

**New York State Department of Environmental Conservation**

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035



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

**Condition 26: Compliance Demonstration**  
Effective between the dates of 02/02/2015 and 02/01/2025

**Applicable State Requirement:6 NYCRR 211.2**

**Item 26.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 26.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Except as permitted by a specific part of Title 6 of the NYCRR 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 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.

Reference Test Method: Reference Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 27: Emission Point Definition By Emission Unit**  
Effective between the dates of 02/02/2015 and 02/01/2025

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 27.1:**

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:**



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:**

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 02/02/2015 and 02/01/2025**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 28.1:**

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 for chemical processing" 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 6 NYCRR 228-1.4(e)(3), these aerospace coatings are not subject to the VOC limits of Table E. 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:**

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 6NYCRR228-1.4(b)(4) Table B4 and falls into the category "miscellaneous metal parts coatings" and then "Pretreatment Coatings". This workpiece classification dictates that the coating VOC content shall not exceed 3.5 lb/(gallon less water and exempt solvents) and this limit is applicable for either air dried or bake dried.

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:**

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:**

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:**

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:**

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:**

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:**

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:**

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 ROTOCCLONE

Emission Source/Control: SAW01 - Process

