

**New York State Department of Environmental Conservation
Facility DEC ID: 8073000001**



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

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-0730-00001/00024
Effective Date: 07/08/1998 Expiration Date: No expiration date

Permit Issued To: CAF (USA) INC
1404 K STREET NW SUITE 803
WASHINGTON, DC 20005

Contact: WILLIAM A RUNNER
CAF (USA) INC
300 EAST EIGHTEENTH ST
ELMIRA, NY 14903
(607) 737-3032

Facility: CAF (USA) INC
300 EAST 18TH ST
ELMIRA HEIGHTS, NY 14903

Description:

This is an initial Air State Facility permit for a facility that is used for manufacturing and assembly of passenger rail cars. Air contaminant emissions are associated with an Emission Unit 1-BLDGS, which includes surface coating operations and minor parts cleaning. Other facility air emissions come from natural gas-fired combustion sources used to heat buildings and other minor exempt emission sources. The permit contains annual emission limits for nine individual HAPs (methanol, 1,1,1 trichloroethane, dichloromethane, methyl ethyl ketone, styrene, 1,2 ethanediol, toluene, and xylene), total HAPs and VOCs. These emission limits will cap facility emissions to below the applicable thresholds for requiring the facility obtain a Title V facility permit.

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: PETER A LENT
DIVISION OF ENVIRONMENTAL PERMITS
6274 EAST AVON LIMA RD
AVON, NY 14414-9519

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 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 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 and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 8
HEADQUARTERS



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

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 3-0301.2(g)

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 written or verbal notification is provided by the Department at least 24 hours prior to such inspection.

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. 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 and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

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.

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

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Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 8 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(716) 226-2466



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: CAF (USA) INC
1404 K STREET NW SUITE 803
WASHINGTON, DC 20005

Facility: CAF (USA) INC
300 EAST 18TH ST
ELMIRA HEIGHTS, NY 14903

Authorized Activity By Standard Industrial Classification Code:
3743 - RAILROAD EQUIPMENT



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 30 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 4 6NYCRR 200.7: Maintenance of equipment
- 9 6NYCRR 201-1.7: Recycling and Salvage
- 10 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the Air
- 12 6NYCRR 201-3.2(a): Proof of Eligibility
- 13 6NYCRR 201-3.3(a): Proof of Eligibility
- 27 6NYCRR 202-1.1: Required emissions tests
- 29 6NYCRR 211.3: Visible emissions limited.
- 1 6NYCRR 200: Statement of Applicability to Facility
- 2 6NYCRR 200.5: Sealing
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- 5 6NYCRR 201-1.1(a): Contaminant List
- 6 6NYCRR 201-1.2: Unpermitted Emission Sources
- 7 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
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- 11 6NYCRR 201-1.10(a): Public Access to Recordkeeping
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- *15 6NYCRR 201-6.2(c): Compliance Demonstration
- *16 6NYCRR 201-6.2(c): Compliance Demonstration
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- *24 6NYCRR 201-6.2(c): Compliance Demonstration
- *25 6NYCRR 201-6.2(c): Compliance Demonstration
- 26 6NYCRR 201-7.2(e): Compliance Demonstration
- 31 40CFR 82, Subpart A: Production and Consumption Controls
- 32 40CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC)
- 33 40CFR 82, Subpart F: Recycling and Emissions Reduction

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 34 6NYCRR 201-5: General Provisions
- 35 6NYCRR 201-5: Emission Unit Definition
- 28 6NYCRR 211.2: Air pollution prohibited
- 36 6NYCRR 217-3.2(a): Diesel truck opacity limitation
- 37 6NYCRR 217-3.2(b): Idling of diesel trucks limited



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Emission Unit Level

38 6NYCRR 201-5: Emission Point Definition By Emission Unit

39 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping. Permit Effective Date: 07/08/1998
Permit Expiration Date: No expiration date.



FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 30: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 30.1:

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

Condition 4: Maintenance of equipment
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 4.1:

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

Condition 9: Recycling and Salvage
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 9.1:

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.

Condition 10: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 10.1:

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.

Condition 12: Proof of Eligibility
Effective between the dates of 07/08/1998 and Permit Expiration Date



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Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 12.1:

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.

Condition 13: Proof of Eligibility

Effective between the dates of 07/08/1998 and Permit Expiration Date

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

Item 13.1:

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.

Condition 27: Required emissions tests

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 27.1:

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

Condition 29: Visible emissions limited.

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 29.1:

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-



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minute period per hour of not more than 57 percent opacity.

Condition 1: Statement of Applicability to Facility
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200

Item 1.1:

The requirements of 6 NYCRR Part 200 apply to this facility.

Condition 2: Sealing
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 2.1:

(a) 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 labelling 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.

(b) 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.

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 3: Acceptable ambient air quality
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 3.1:

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.

Condition 5: Contaminant List
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.1(a)



Item 5.1:

Emissions of the following contaminants are allowed under this permit.

CAS No: 000067-56-1

Name: METHYL ALCOHOL

CAS No: 000071-55-6

Name: ETHANE, 1,1,1-TRICHLORO

CAS No: 000075-09-2

Name: DICHLOROMETHANE

CAS No: 000078-93-3

Name: METHYL ETHYL KETONE

CAS No: 000100-42-5

Name: STYRENE

CAS No: 000107-21-1

Name: 1,2-ETHANEDIOL

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 000110-54-3

Name: HEXANE

CAS No: 000630-08-0

Name: CARBON MONOXIDE

CAS No: 001330-20-7

Name: XYLENE, M, O & P MIXT.

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0



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Name: VOC

Item 5.2:

The Facility is authorized to emit the regulated contaminants cited in Item 5.1 from the emission units specified in this permit.

Condition 6: Unpermitted Emission Sources
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 6.1:

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

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

Condition 7: Unavoidable Noncompliance and Violations
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.4

Item 7.1:

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 or certificate issued for the corresponding air contamination source. 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



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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.

(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.

Condition 8: Emergency Defense
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 8.1:

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.



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

Condition 11: Public Access to Recordkeeping
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.10(a)

Item 11.1:

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.

Condition 14: Facility Permissible Emissions
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 14.1:

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: 000067-56-1 PTE: 19,800 pounds per year
Name: METHYL ALCOHOL

CAS No: 000071-55-6 PTE: 19,800 pounds per year
Name: ETHANE, 1,1,1-TRICHLORO

CAS No: 000075-09-2 PTE: 19,800 pounds per year
Name: DICHLOROMETHANE

CAS No: 000078-93-3 PTE: 19,800 pounds per year
Name: METHYL ETHYL KETONE

CAS No: 000100-42-5 PTE: 19,800 pounds per year
Name: STYRENE

CAS No: 000107-21-1 PTE: 19,800 pounds per year
Name: 1,2-ETHANEDIOL

CAS No: 000108-88-3 PTE: 19,800 pounds per year



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Name: TOLUENE

CAS No: 000110-54-3

PTE: 19,800 pounds per year

Name: HEXANE

CAS No: 001330-20-7

PTE: 19,800 pounds per year

Name: XYLENE, M, O & P MIXT.

CAS No: 0NY100-00-0

PTE: 49,800 pounds per year

Name: HAP

CAS No: 0NY998-00-0

PTE: 99,800 pounds per year

Name: VOC

Condition 15: Compliance Demonstration

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000100-42-5 STYRENE

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide emissions of Styrene emissions shall be limited to 9.9 tons per year. Emissions shall be calculated, based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 16: Compliance Demonstration

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)



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Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide VOC emissions shall be limited to 49.9 tons per year. VOC emissions shall be calculated based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 17: Compliance Demonstration

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide HAP emissions shall be limited to 24.9 tons per year. HAP emissions shall be calculated based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY



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Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 18: Compliance Demonstration

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide emissions of 1,2 Ethanediol shall be limited to 9.9 tons per year. Emissions shall be calculated based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 19: Compliance Demonstration

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000110-54-3 HEXANE

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide emissions of Hexane emissions shall be limited to 9.9 tons per year. Emissions shall be calculated, based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 20: Compliance Demonstration
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000108-88-3 TOLUENE

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide emissions of Toluene emissions shall be limited to 9.9 tons per year. Emissions shall be calculated, based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 21: Compliance Demonstration
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 21.1:



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The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000078-93-3 METHYL ETHYL KETONE

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide emissions of Methyl Ethyl Ketone emissions shall be limited to 9.9 tons per year. Emissions shall be calculated, based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 22: Compliance Demonstration

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 22.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 001330-20-7 XYLENE, M, O & P MIXT.

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide emissions of Xylene emissions shall be limited to 9.9 tons per year. Emissions shall be calculated, based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY



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Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 23: Compliance Demonstration

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000075-09-2 DICHLOROMETHANE

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide emissions of Dichloromethane emissions shall be limited to 9.9 tons per year.

Emissions shall be calculated, based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 24: Compliance Demonstration

Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 24.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000071-55-6 ETHANE, 1,1,1-TRICHLORO

Item 24.2:

Compliance Demonstration shall include the following monitoring:



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Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide emissions of 1,1,1-Trichloroethane emissions shall be limited to 9.9 tons per year. Emissions shall be calculated, based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 25: Compliance Demonstration
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.2(c)

Item 25.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000067-56-1 METHYL ALCOHOL

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total facility-wide emissions of Methanol emissions shall be limited to 9.9 tons per year. Emissions shall be calculated, based on a log of purchase and delivery records of paint/solvents, recorded on a monthly basis, and incorporated into a twelve-month rolling total.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 26: Compliance Demonstration
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.2(e)



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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:

On an annual basis 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 within the limits imposed by the emissions cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold values that would require compliance with an applicable requirement.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/06/1999 for the period 07/08/1998 through 07/07/1999

Condition 31: Production and Consumption Controls
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 82, Subpart A

Item 31.1:

If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

Condition 32: Servicing of Motor Vehicle Air Conditioners (MVAC)
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 82, Subpart B

Item 32.1:

If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-

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22 refrigerant.

Condition 33: Recycling and Emissions Reduction
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 33.1:

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVAC's in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR Part 82.161.
- d. Persons disposing of small appliances, MVAC's, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR Part 82.166. ("MVAC-like appliance as defined at 40 CFR Part 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR Part 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR Part 82.166.



STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 34: General Provisions
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 34.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 34.2:

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.

Item 34.3:

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

Item 34.4:

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 34.5:

The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of Part 201 and of the Act.

Condition 35: Emission Unit Definition
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 35.1:

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

Emission Unit: 1-BLDGS

Emission Unit Description:



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SURFACE COATING OPERATIONS CONDUCTED IN PRODUCTION BUILDINGS 1, 3 AND 4 (AND IN THE MAINTENANCE DEPARTMENT, BUILDING 6) PLUS MINOR PARTS CLEANING OPERATIONS, ALL INVOLVING THE USE AND EMISSION OF VOC'S, AND THE EMISSION OF UP TO NINE (9) HAZARDOUS AIR POLLUTANTS, ALL COMPONENTS OF PAINTS AND SOLVENTS. BUILDING 1 CONTAINS A TOTAL OF FIVE (5) EMISSION POINTS (SEE BELOW), ALL PAINT BOOTHS (00001, 00002, 00003, 00006 AND 00007). BUILDINGS 3, 4 AND 6 ALSO MAY GENERATE THE SAME VOC'S FROM SIMILAR MINOR SURFACE COATING ACTIVITIES, BUT AT "INSIGNIFICANT" EMISSIONS LEVELS. IN THIS APPLICATION, VOC'S EMISSIONS FROM ALL FACILITY SOURCES ARE "CAPPED" UNDER THE SAME COMPLIANCE CERTIFICATION PLAN, NAMELY, A LOG OF PURCHASE AND DELIVERY RECORDS OF ALL PAINTS AND SOLVENTS USED AT THE FACILITY, BY TOTAL VOC'S AND HAP'S, WITH 12 MONTH RUNNING TOTALS TO DEMONSTRATE TOTAL USAGE WITHIN THE CAPPING LEVELS OF THIS PERMIT AS SHOWN IN SECTION 111.

Building(s): 1
3
4
6

Condition 28: Air pollution prohibited
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 28.1:

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 36: Diesel truck opacity limitation
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 217-3.2(a)



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Item 36.1:

No person who owns, operates or leases a vehicle propelled by a diesel engine or who owns, leases or occupies land and has actual or apparent dominion or control over the operation of a vehicle propelled by a diesel engine which is present on said land, shall operate said vehicle or allow or permit it to be operated, in such a manner that exhaust emissions of a shade of blue, black, or gray equal to or greater than No. 1 on the Ringelmann chart (20 percent opacity) or equivalent standard acceptable to the commissioner are produced for a continuous period of more than five seconds when the vehicle is in motion.

Condition 37: Idling of diesel trucks limited
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 217-3.2(b)

Item 37.1:

No person who owns, operates or leases a bus or truck, the motive power for which is provided by a diesel engine or who owns, leases or occupies land and has the actual or apparent dominion or control over the operation of a bus or truck present on such land, the motive power for which said bus or truck is provided by a diesel engine, shall allow or permit the diesel engine of such bus or truck to idle for more than five consecutive minutes when the bus or truck is not in motion, except as otherwise permitted by 6 NYCRR Subpart 217-3.3.

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

Condition 38: Emission Point Definition By Emission Unit
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 38.1:

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

Emission Unit: 1-BLDGS

Emission Point: 00001

Height (ft.): 45 Diameter (in.): 48
NYTMN (km.): 4665.221 NYTME (km.): 349.231 Building: 1

Emission Point: 00002

Height (ft.): 45 Diameter (in.): 48
NYTMN (km.): 4665.221 NYTME (km.): 349.231 Building: 1

Emission Point: 00003

Height (ft.): 64 Diameter (in.): 42
NYTMN (km.): 4665.221 NYTME (km.): 349.231 Building: 1

Emission Point: 00006



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Facility DEC ID: 8073000001

Height (ft.): 20 Diameter (in.): 48
NYTMN (km.): 4665.221 NYTME (km.): 349.231 Building: 1

Emission Point: 00007
Height (ft.): 20 Diameter (in.): 48
NYTMN (km.): 4665.221 NYTME (km.): 349.231 Building: 1

Condition 39: Process Definition By Emission Unit
Effective between the dates of 07/08/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 39.1:

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

Emission Unit: 1-BLDGS
Process: 100
Process Description:
PAINTING OF METAL PARTS AND PASSENGER RAIL
CARS IN BLDGS 1, 3, 4 AND 6. INCLUDES FIVE
(5) EMISSION POINTS IN BLDG 1. TOTAL VOC
EMISSIONS ARE CAPPED AT 99,800 LB/YR (49.9
TPY) AND 19,800 LB/YR (9.9 TPY) FOR EACH
HAP, AND 49,800 LB/YR (24.9 TPY) FOR ALL H
AP'S.

Emission Source/Control: 00001 - Process

Emission Source/Control: 00002 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00006 - Process

Emission Source/Control: 00007 - Process