

New York State Department of Environmental Conservation
Facility DEC ID: 8460600018



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-4606-00018/00015
Effective Date: 04/08/1999 Expiration Date: No expiration date

Permit Issued To: ALSTOM TRANSPORTATION INC
4 SKYLINE DR
HAWTHORNE, NY 10532-2160

Contact: LAWRENCE P TARNACKI
ALSTOM TRANSPORTATION INC
ONE TRANSIT DRIVE
HORNELL, NY 14843
(607) 324-4595

Facility: ALSTOM - HORNELL APPARATUS SHOP
HORTON ST
HORNELL, NY 14843

Contact: LAWRENCE P TARNACKI
ALSTOM TRANSPORTATION INC
ONE TRANSIT DRIVE
HORNELL, NY 14843
(607) 324-4595

Description:
Initial State Facility Air Permit for the Hornell Apparatus Shop which contains a proceco parts washer, paint booths, air arc welding booth and welding booths for rail car truck maintenance and rebuilding. The facility consists of a single emission unit identified as Emission Unit U-HASPB which includes the two paint booths where the surface coating of small parts and rail car trucks with topcoats, enamels, activators, hardeners, additives, primers and epoxy primers occur.

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 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. 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

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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4 SKYLINE DR
HAWTHORNE, NY 10532-2160

Facility: ALSTOM - HORNELL APPARATUS SHOP
HORTON ST
HORNELL, NY 14843

Authorized Activity By Standard Industrial Classification Code:



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.5: Sealing
- 2 6NYCRR 200.6: Acceptable ambient air quality
- 3 6NYCRR 200.7: Maintenance of equipment
- 4 6NYCRR 201-1.1(a): Contaminant List
- 5 6NYCRR 201-1.2: Unpermitted Emission Sources
- 6 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
- 7 6NYCRR 201-1.5: Emergency Defense
- 8 6NYCRR 201-1.7: Recycling and Salvage
- 9 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected
Contaminants to the Air
- 10 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 11 6NYCRR 201-3.2(a): Proof of Eligibility
- 12 6NYCRR 201-3.3(a): Proof of Eligibility
- 13 6NYCRR 202-1.1: Required emissions tests
- 14 6NYCRR 211.3: Visible emissions limited.
- 15 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 16 6NYCRR 228.10: Handling, storage, and disposal of volatile organic
compounds

Emission Unit Level

EU=U-HASPB

- 17 6NYCRR 212.4(c): Compliance Demonstration
- 18 6NYCRR 212.6(a): Compliance Demonstration
- 19 6NYCRR 228.3(a): volatile organic compound emission control requirements
- 20 6NYCRR 228.4: Compliance Demonstration
- 21 6NYCRR 228.5(a): Compliance Demonstration
- 22 6NYCRR 228.5(a): Compliance Demonstration
- 23 6NYCRR 228.5(b): method 24 40 CFR 60
- 24 6NYCRR 228.5(c): alternative analytical methods
- 25 6NYCRR 228.6(a): prohibition of sale or specification
- 26 6NYCRR 228.7: Compliance Demonstration

EU=U-HASPB,Proc=PAB

- 27 6NYCRR 228.5(d): samples

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 28 6NYCRR 201-5: General Provisions: Facilities Subject to Subparts
201-5 and 201-6
- 29 6NYCRR 201-5: General Provisions: Facilities Subject to Subpart
201-5 but not 201-6



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- 30 6NYCRR 201-5: State facility permit capping conditions
- 31 6NYCRR 201-5: Emission Unit Definition
- 32 6NYCRR 211.2: Air pollution prohibited
- 33 6NYCRR 217-3.2(a): Diesel truck opacity limitation
- 34 6NYCRR 217-3.2(b): Idling of diesel trucks limited

Emission Unit Level

- 35 6NYCRR 201-5: Emission Point Definition By Emission Unit
 - 36 6NYCRR 201-5: Process Definition By Emission Unit
- 7699 - REPAIR SERVICES, NEC

Permit Effective Date: 04/08/1999

Permit Expiration Date: No expiration date.



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FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 1: Sealing

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(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 2: Acceptable ambient air quality

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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 3: Maintenance of equipment

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

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.

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Condition 4: Contaminant List

Effective between the dates of 04/08/1999 and Permit Expiration Date

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

Item 4.1:

Emissions of the following contaminants are allowed under this permit.

CAS No: 000078-93-3

Name: METHYL ETHYL KETONE

CAS No: 000108-10-1

Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 000110-80-5

Name: ETHANOL, 2-ETHOXY-

CAS No: 000112-07-2

Name: ETHANOL, 2-BUTOXY-, ACETATE

CAS No: 000630-08-0

Name: CARBON MONOXIDE

CAS No: 000822-06-0

Name: HEXANE, 1,6-DIISOCYANATO-

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

Name: VOC

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Item 4.2:

The Facility is authorized to emit the regulated contaminants cited in Item 4.1 from the emission units specified in this permit.

Condition 5: Unpermitted Emission Sources

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 5.1:

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 6: Unavoidable Noncompliance and Violations

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.4

Item 6.1:

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 malfunction by telephone to the commissioner's representative as soon as possible during normal working



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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 7: Emergency Defense
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 7.1:

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.

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



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requirement.

Condition 8: Recycling and Salvage
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 8.1:

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 9: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 9.1:

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 10: Public Access to Recordkeeping
Effective between the dates of 04/08/1999 and Permit Expiration Date

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

Item 10.1:

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 11: Proof of Eligibility
Effective between the dates of 04/08/1999 and Permit Expiration Date

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

Item 11.1:

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



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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 12: Proof of Eligibility

Effective between the dates of 04/08/1999 and Permit Expiration Date

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

Item 12.1:

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 13: Required emissions tests

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 13.1:

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 14: Visible emissions limited.

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 14.1:

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 15: Open Fires Prohibited at Industrial and Commercial Sites

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 15.1:



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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 16: Handling, storage, and disposal of volatile organic compounds
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 16.1:

No owner or operator of a facility subject to 6NYCRR Part 228 shall:

- (a) use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup, or coating removal;
- (b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup, or coating removal;
- (c) use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere;
- (d) 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; or
- (e) use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

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

Condition 17: Compliance Demonstration
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-HASPB

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.



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Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-HASPB

Item 18.2:

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, except only the emission of uncombined water. Visible emissions monitoring will be conducted at the request of the agency to demonstrate compliance with this limit.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: METHOD 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: volatile organic compound emission control requirements

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(a)

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Item 19.1:

This Condition applies to Emission Unit: U-HASPB

Item 19.2:

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2 of Part 228, unless an approved coating system or approved control equipment is utilized or a variance has been granted.

Condition 20: Compliance Demonstration

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-HASPB

Item 20.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to 6NYCRR Part 228.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-HASPB

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

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RECORDS AND MSDS SHEETS WILL BE
MAINTAINED THAT VERIFY THE VOC LOADING OF
ALL PAINTS USED BELOW 3.5 LBS
VOC/GALLON.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 22: Compliance Demonstration
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-HASPB

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 23: method 24 40 CFR 60



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Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(b)

Item 23.1:

This Condition applies to Emission Unit: U-HASPB

Item 23.2:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings are presented in appendix A, method 24, of 40 CFR 60.

Condition 24: alternative analytical methods

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(c)

Item 24.1:

This Condition applies to Emission Unit: U-HASPB

Item 24.2:

Subject to the approval of the department, alternate analytical methods for surface coating may be acceptable.

Condition 25: prohibition of sale or specification

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.6(a)

Item 25.1:

This Condition applies to Emission Unit: U-HASPB

Item 25.2:

No person shall sell, specify, or require for use the application of a coating on a part or product at a facility with a coating line described in table 1 or 2 of 6NYCRR Part 228 if such use is prohibited. This prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

- (1) coatings utilized at surface coating lines where control equipment has been installed to meet the allowable VOC content limitations specified in tables 1 and 2 of Part 228;
- (2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Part 228; and
- (3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility.

Condition 26: Compliance Demonstration

Effective between the dates of 04/08/1999 and Permit Expiration Date



New York State Department of Environmental Conservation

Permit ID: 8-4606-00018/00015

Facility DEC ID: 8460600018

Applicable Federal Requirement: 6NYCRR 228.7

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-HASPB

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Air-dried and forced warm-air dried coatings used for the surface coating of miscellaneous metal parts and products may contain a maximum of 3.5 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: AIR DRIED/FORCED WARM AIR-DRIED COATING - MISCELLANEOUS METAL PARTS

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27: samples

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 27.1:

This Condition applies to Emission Unit: U-HASPB

Process: PAB

Item 27.2:

Representatives of the department shall be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance.



STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 28: General Provisions: Facilities Subject to Subparts 201-5 and 201-6
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 28.1:

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 28.2:

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 28.3:

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

Item 28.4:

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.

Condition 29: General Provisions: Facilities Subject to Subpart 201-5 but not 201-6
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 29.1:

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 30: State facility permit capping conditions
Effective between the dates of 04/08/1999 and Permit Expiration Date



New York State Department of Environmental Conservation

Permit ID: 8-4606-00018/00015

Facility DEC ID: 8460600018

Applicable State Requirement: 6NYCRR 201-5

Item 30.1:

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 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 those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Condition 31: Emission Unit Definition

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 31.1:

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

Emission Unit: U-HASPB

Emission Unit Description:

UHASPB IS COMPRISED OF THE TWO PAINT BOOTHES HOUSED WITHIN THE HAS. THE TWO PAINT BOOTHES ARE LOCATED AT COLUMN MARKINGS D12 AND K10 AND ARE CLASSIFIED AS EMISSION POINTS 00002 AND 00003, RESPECTIVELY.

Building(s): HAS

Condition 32: Air pollution prohibited

Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 32.1:

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 33: Diesel truck opacity limitation

Effective between the dates of 04/08/1999 and Permit Expiration Date

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

Item 33.1:

No person who owns, operates or leases a vehicle propelled by a diesel engine or who owns, leases or occupies



New York State Department of Environmental Conservation

Permit ID: 8-4606-00018/00015

Facility DEC ID: 8460600018

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 34: Idling of diesel trucks limited
Effective between the dates of 04/08/1999 and Permit Expiration Date

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

Item 34.1:

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 35: Emission Point Definition By Emission Unit
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 35.1:

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

Emission Unit:	U-HASPB		
Emission Point:	00002		
Height (ft.):	29	Diameter (in.):	42
		Building:	HAS
Emission Point:	00003		
Height (ft.):	19	Diameter (in.):	24
		Building:	HAS

Condition 36: Process Definition By Emission Unit
Effective between the dates of 04/08/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 36.1:

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

New York State Department of Environmental Conservation

Permit ID: 8-4606-00018/00015

Facility DEC ID: 8460600018



Emission Unit: U-HASPB

Process: PAB

Source Classification Code: 4-02-001-01

Process Description:

SURFACE COATING OF SMALL PARTS AND RAILCAR TRUCKS OCCUR IN THE PAINT BOOTHS. SURFACE COATING MATERIALS INCLUDE: TOPCOATS, ENAMELS, ACTIVATORS, HARDENERS, ADDITIVES, PRIMERS, AND EXOXY PRIMERS.

Emission Source/Control: FILTR - Process