



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-0608-00157/00024  
Mod 0 Effective Date: 01/22/2008 Expiration Date: No expiration date.  
Mod 1 Effective Date: 12/15/2010 Expiration Date: No expiration date.

Permit Issued To: SPRAY-TECH FINISHING INC  
825 ALLEN ST  
JAMESTOWN, NY 14702-0278

Contact: GUY F LOMBARDO  
DAWSON METAL COMPANY INC  
825 ALLEN STREET  
JAMESTOWN, NY 14702  
(716) 664-3815

Facility: SPRAY-TECH FINISHING BUFFALO ST PROPERTY  
443 BUFFALO ST  
JAMESTOWN, NY 14702-0278

Description:  
Spray Tech Finishing is located in the city of Jamestown in Chautauqua County. It surface coats a myriad of metal parts for a variety of industrial customers. The facility has nine spray booths and three drying ovens.

This permit modification added two powder coating booths to the permit so they can also apply solvent based paints in these booths, emission points (EPs) 5 & 6, it adds the powder coating baking oven, EP 24, to the permit so they can dry solvent based coated parts, and it adds paint booth filters for all the paint booths. To simplify the permit the four permit process descriptions/ids, 001, 002, 003 & 004 in the previous permit were consolidated into one, process 001. No process or equipment changes are involved with the consolidation. This permit modification does not include any changes to the volatile organic compound (VOC) or hazardous air pollutant (HAP) emission caps that the company previously accepted. A permit condition was added which limits the particulate emissions from the spray booths. It is not expected change any of the current operating methods.

Spray Tech decided to reformulate existing coatings and prohibit any further use of coatings that contain chromium, lead, manganese, nickel or cadmium compounds to avoid the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations (40 CFR Part 63 subpart HHHHHH (6H's)). This is a management decision and there are no permit conditions that address this, but if Spray Tech uses coatings that contain the metals above; they will have to comply with the regulatory requirements.

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9060800157**



In Air State Facility Permit Renewal 0, Modification 0 that was issued on January 22, 2008 Spray Tech accepted a federally enforceable emission cap limiting both volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) to 9 tons per year or less. The emission cap is more stringent than the Title V threshold thereby allowing the facility to avoid Title V permitting requirements. It also caps the facility out of surface coating requirements of 6NYCRR Part 228.

At Spray-Techs' request the emission cap was designed so that they only have to track the total volume of paint and solvents that are purchased. This was accomplished by capping the combined weight of the coatings and solvent used to act as a surrogate for the emissions of VOC and HAPs. A worst case scenario was used by assuming that all of the coating and solvents are 100% HAPs (for the condition limiting HAPs), 100% VOC (for the condition limiting VOC) and that the weight for each gallon of coating and solvent was 10.21 lb/gal. (the maximum density of coating used by the facility). Then by limiting the combined usage of coatings and solvents to 1762 gal/yr, both the VOC and HAPs emissions will be less than the 9 tons per year cap. The paint and solvent usage must be tracked monthly so that a rolling 12 month total will be calculated monthly. An emission cap certification must be submitted each year to the Department.

DAR-1 (formerly Air Guide -1) is department guidance used to protect public health against the toxic effects of air emissions. Spray-Tech's air emissions were evaluated using this guidance. With the limiting of the plant's solvent and coating usage to 1762 gallons per year the impact screening and modeling show that source emissions to be within DAR-1 ambient concentration values. This means that Spray-Tech passes the DAR-1 criteria and its emissions are also compliant with 6NYCRR Part 212.

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:           LISA PORTER  
  270 MICHIGAN AVE  
  BUFFALO, NY 14203-2915

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
  - Permit modifications, suspensions or revocations by the Department

**Facility Level**

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



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

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

**Condition 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.



**Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Replaces Condition(s) 4**

**Item 1-1.1:**

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

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

**Condition 4: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Replaced by Condition(s) 1-1**

**Item 4.1:**

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

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

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

**Condition 1-2: Submission of application for permit modification or renewal-REGION 9**

**HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Replaces Condition(s) 5**

**Item 1-2.1:**

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

NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165



**Condition 5: Submission of application for permit modification or renewal-REGION 9  
HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Replaced by Condition(s) 1-2**

**Item 5.1:**

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

NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2999  
(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-0608-00157/00024

Facility DEC ID: 9060800157



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: SPRAY-TECH FINISHING INC  
825 ALLEN ST  
JAMESTOWN, NY 14702-0278

Facility: SPRAY-TECH FINISHING BUFFALO ST PROPERTY  
443 BUFFALO ST  
JAMESTOWN, NY 14702-0278

Authorized Activity By Standard Industrial Classification Code:  
3444 - SHEET METAL WORK  
3479 - METAL COATING AND ALLIED SERVICES, NEC

Mod 0 Permit Effective Date: 01/22/2008  
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 12/15/2010  
date.

Permit Expiration Date: No expiration



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Emission Unit Level**

**EU=A-00001**

- \*2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 1-1 6 NYCRR 212.4 (c): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 4 ECL 19-0301: Contaminant List
- 1-2 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 6 6 NYCRR Subpart 201-5: Emission Unit Definition
- 1-3 6 NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 8 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 9 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



**FEDERALLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Emission Unit 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: Visible Emissions Limited - 6 NYCRR 211.3**

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

**Item L: Open Fires Prohibitions - 6 NYCRR 215.2**

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item M: Permit Exclusion - ECL 19-0305**

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

**Item N: Federally Enforceable Requirements - 40 CFR 70.6 (b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state



**New York State Department of Environmental Conservation**

Permit ID: 9-0608-00157/00024

Facility DEC ID: 9060800157



CAS No: 0NY998-00-0 VOC

**Item 2.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1.) The facility's emissions of Volatile Organic Compounds (VOCs) shall be limited to 9 tons per year. The total usage of coatings and solvent shall act as a surrogate for the emissions of VOCs. If one assumes each coating and solvent is 100% VOC and the weight for each gallon of coating and solvent to be 10.21 #/ gal (the maximum density used by the facility) then limiting total usage of coatings and solvents to a combined value of 1762 gal/yr will limit the facility emissions of VOCs to 9 tons per year.

2.) This limit is more stringent than the Title V threshold thereby allowing the facility to avoid Title V permitting requirements. It also caps the facility out of 6NYCRR Part 228 thereby avoiding surface coating emission control requirements of Part 228.

3.) The 12 calendar rolling total paint and solvent usage shall be calculated monthly. This calculation and record update shall be performed within 30 days of the end of each calendar 12 month period.

4.) All records used to determine paint and solvent usage shall be available on site and furnished to the Department upon request during normal business hours. Such records shall be kept on site for a period of five years.

5.) The facility shall complete Department published reporting forms and submit them to the Department in order to satisfy its annual emission capping compliance certification requirement.

6.) The first annual emission capping compliance certification is to be submitted no later than January 31, 2008. This yearly submittal covers the calendar year.

Parameter Monitored: COATING MIXED

Upper Permit Limit: 1762 gallons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

**New York State Department of Environmental Conservation**

Permit ID: 9-0608-00157/00024

Facility DEC ID: 9060800157



The initial report is due 1/30/2009.  
Subsequent reports are due every 12 calendar month(s).

**Condition 3: Capping Monitoring Condition**  
**Effective between the dates of 01/22/2008 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 3.1:**

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

6 NYCRR 201-6.1 (a) (1)

**Item 3.2:**

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

**Item 3.3:**

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

**Item 3.4:**

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

**Item 3.5:**

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

**Item 3.6:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 HAP

**Item 3.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

**New York State Department of Environmental Conservation**

Permit ID: 9-0608-00157/00024

Facility DEC ID: 9060800157



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

Monitoring Description:

- 1.) The facility's emissions of Hazardous Air Pollutants (HAP) shall be limited to 9 tons per year. The total usage of coatings and solvent shall act as a surrogate for the emissions of HAPs. If one assumes that each coating and each solvent is 100% HAPs and the weight for each gallon of coating and solvent to be 10.21 #/ gal (the maximum density used by the facility) then limiting total usage of coatings and solvents to a combined value of 1762 gal/yr will limit the facility emissions of HAPs to 9 tons per year.
- 2.) This limit is more stringent than the Title V threshold for both any single HAP and total HAPs thereby allowing the facility to avoid Title V permitting requirements.
- 3.) The 12 calendar rolling total paint and solvent usage shall be calculated monthly. This calculation and record update shall be performed within 30 days of the end of each calendar 12 month period.
- 4.) All records used to determine paint and solvent usage shall be available on site and furnished to the Department upon request during normal business hours. Such records shall be kept on site for a period of five years.
- 5.) The facility shall complete Department published reporting forms and submit them to the Department in order to satisfy its annual emission capping compliance certification requirement.
- 6.) The first annual emission capping compliance certification is to be submitted no later than January 31, 2008. This yearly submittal covers the calendar year.

Parameter Monitored: COATING MIXED

Upper Permit Limit: 1762 gallons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

**Condition 1-1: Compliance Demonstration**  
**Effective between the dates of 12/15/2010 and Permit Expiration Date**

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

**New York State Department of Environmental Conservation**

Permit ID: 9-0608-00157/00024

Facility DEC ID: 9060800157



**Item 1-1.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-1.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

- 1.) The emission of solid particulates are limited to less than 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. One pound equals 7000 grains.
- 2.) The proper filters shall be used and appropriately maintained in all spray booths while the booths are being used.
- 3.) Compliance testing shall be conducted at the Departments request. The test report shall be submitted to the department within 60 days of testing.

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

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



**Condition 4: Contaminant List**

**Effective between the dates of 01/22/2008 and Permit Expiration Date**

**Applicable State Requirement:ECL 19-0301**

**Item 4.1:**

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

CAS No: 0NY075-00-0  
Name: PARTICULATES

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

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

**Condition 1-2: Unavoidable noncompliance and violations**

**Effective between the dates of 12/15/2010 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Replaces Condition(s) 5**

**Item 1-2.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a



written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

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

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

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

**Condition 6: Emission Unit Definition**  
**Effective between the dates of 01/22/2008 and Permit Expiration Date**

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

**Item 6.1(From Mod 1):**

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

Emission Unit: A-00001

Emission Unit Description:

Facility has nine spraybooths where liquid/solvent paint is applied to various metal parts as requested by customers. The facility also operates three drying/baking ovens.

Building(s): 12  
17  
5A  
5B

**Condition 1-3: Air pollution prohibited**  
**Effective between the dates of 12/15/2010 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 211.2**

**Replaces Condition(s) 7**

**Item 1-3.1:**

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.



Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

**Condition 8: Emission Point Definition By Emission Unit**  
**Effective between the dates of 01/22/2008 and Permit Expiration Date**

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

**Item 8.1(From Mod 1):**

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

Emission Unit:	A-00001		
Emission Point:	00005		
Height (ft.):	50	Diameter (in.):	45
NYTMN (km.):	4670.3	NYTME (km.):	151. Building: 17
Emission Point:	00006		
Height (ft.):	50	Diameter (in.):	45
NYTMN (km.):	4670.3	NYTME (km.):	151. Building: 17
Emission Point:	00024		
Height (ft.):	50	Diameter (in.):	15
NYTMN (km.):	4670.3	NYTME (km.):	151. Building: 17
Emission Point:	00033		
Height (ft.):	56	Diameter (in.):	24
NYTMN (km.):	4670.3	NYTME (km.):	151. Building: 5B
Emission Point:	00034		
Height (ft.):	56	Length (in.):	10
NYTMN (km.):	4670.3	NYTME (km.):	151. Width (in.): 10 Building: 5A
Emission Point:	00038		
Height (ft.):	56	Diameter (in.):	24
NYTMN (km.):	4670.3	NYTME (km.):	151. Building: 5A
Emission Point:	00040		
Height (ft.):	56	Diameter (in.):	24
NYTMN (km.):	4670.3	NYTME (km.):	151. Building: 5A
Emission Point:	00043		
Height (ft.):	57	Diameter (in.):	20
NYTMN (km.):	4670.3	NYTME (km.):	151. Building: 12
Emission Point:	00044		
Height (ft.):	58	Diameter (in.):	30



NYTMN (km.): 4670.3	NYTME (km.): 151.	Building: 12
Emission Point: 00045		
Height (ft.): 58	Diameter (in.): 30	
NYTMN (km.): 4670.3	NYTME (km.): 151.	Building: 12
Emission Point: 00059		
Height (ft.): 31	Length (in.): 24	Width (in.): 18
NYTMN (km.): 4670.3	NYTME (km.): 151.	Building: 5B
Emission Point: 00060		
Height (ft.): 31	Length (in.): 24	Width (in.): 18
NYTMN (km.): 4670.3	NYTME (km.): 151.	Building: 5B

**Condition 9: Process Definition By Emission Unit**  
**Effective between the dates of 01/22/2008 and Permit Expiration Date**

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

**Item 9.1(From Mod 1):**

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

Emission Unit: A-00001

Process: 001

Process Description:

Facility has nine spraybooths where liquid/solvent paint is applied to various metal parts as requested by customers. The facility also operates three drying/baking ovens.

NOTE: This modification (Mod 1) consolidates four previous processes into one process. There were no process or equipment changes associated with this consolidation.

Emission Source/Control: 0005C - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0006C - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0033C - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0038C - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0040C - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0044C - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0045C - Control

**New York State Department of Environmental Conservation**

**Permit ID: 9-0608-00157/00024**

**Facility DEC ID: 9060800157**



Control Type: FABRIC FILTER

Emission Source/Control: 0059C - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0060C - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 00005 - Process

Emission Source/Control: 00006 - Process

Emission Source/Control: 00024 - Process

Emission Source/Control: 00033 - Process

Emission Source/Control: 00034 - Process

Emission Source/Control: 00038 - Process

Emission Source/Control: 00040 - Process

Emission Source/Control: 00043 - Process

Emission Source/Control: 00044 - Process

Emission Source/Control: 00045 - Process

Emission Source/Control: 00059 - Process

Emission Source/Control: 00060 - Process

