

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9140200265**



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-1402-00265/00063  
Effective Date: 05/05/2004                      Expiration Date: No expiration date

Permit Issued To: AMERICAN AXLE & MANUFACTURING INC  
1840 HOLBROOK AVE  
DETROIT, MI 48212-3442

Contact: ANTHONY M GLIECO  
AMERICAN AXLE & MFG  
PO BOX 972  
BUFFALO, NY 14240-0972  
(716) 891-7078

Facility: AMERICAN AXLE & MFG BUFFALO PLANT  
1001 E DELEVAN AVE  
BUFFALO, NY 14215

**Description:**

American Axle and Manufacturing, Inc. machines and assemblies automotive sub assemblies such as rear axles, steering linkage, and related components. The facility operates natural gas and # 6 oil fired boilers, machining equipment, painting equipment and a waste water treatment plant. The most recent permit at this facility was issued July 19,1995 for the addition of several new sources of Volatile Organic Compounds. The permit capped the facility below applicability of New Source Review in a Nonattainment area, 231-2, and the Reasonable Available Control Requirements for Nitrogen Oxide emissions, part. 227-2. On October 21, 1998 the facility submitted a State Facility Permit requesting to be capped out of The Title V requirements of 201-6. This included adding an additional "Cap" for VOC emissions and Sulfur dioxide emissions. The potential to emit Hazardous air pollutants are below Title V applicability thresholds. This permit caps the facility out of title V permitting and includes all of the required conditions applicable to the facility.

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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:            DAVID S DENK  
   DIVISION OF ENVIRONMENTAL PERMITS  
   270 MICHIGAN AVE  
   BUFFALO, NY 14203-2999

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 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 and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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

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transfer of ownership.

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

**Item 4.1:**

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

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

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

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 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 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2999  
(716) 851-7165



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: AMERICAN AXLE & MANUFACTURING INC  
1840 HOLBROOK AVE  
DETROIT, MI 48212-3442

Facility: AMERICAN AXLE & MFG BUFFALO PLANT  
1001 E DELEVAN AVE  
BUFFALO, NY 14215

Authorized Activity By Standard Industrial Classification Code:



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6NYCRR 200.3: False statement
- 2 6NYCRR 201-7.2: Facility Permissible Emissions
- \*3 6NYCRR 201-7.2: Compliance Demonstration
- 5 6NYCRR 212.4(c): Compliance Demonstration
- 4 6NYCRR 212.6(a): Compliance Demonstration
- 6 6NYCRR 227-2.3: Facility Permissible Emissions
- \*7 6NYCRR 227-2.3: Compliance Demonstration
- 8 6NYCRR 231-2: Facility Permissible Emissions

**Emission Unit Level**

**EU=U-COMB1**

- 9 6NYCRR 225-1.2(d): Compliance Demonstration
- 10 6NYCRR 227-1.3(a): Compliance Demonstration

**EU=U-PAC01**

- 11 6NYCRR 212.4(c): Compliance Demonstration
- 12 6NYCRR 228.3(a): Compliance Demonstration
- \*13 6NYCRR 231-2: Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 14 ECL 19-0301: Contaminant List
- 15 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 16 6NYCRR 201-5: Emission Unit Definition
- 17 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 18 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 19 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.      3714 - MOTOR VEHICLE PARTS  
& ACCESSORIES

Permit Effective Date: 05/05/2004

Permit Expiration Date: No expiration date.



**FEDERALLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Sealing - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 200.7**

Any person who owns or operates an air contamination

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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 - 6NYCRR Part 201-1.2**

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.

**Item E: Emergency Defense - 6NYCRR Part 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



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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 - 6NYCRR Part 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 - 6NYCRR Part 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 Part 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 Part 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



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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 Part 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 6NYCRR Part 202-1.

**Item K: Visible Emissions Limited - 6 NYCRR Part 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 - 6 NYCRR Part 215**

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.

**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

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limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

**FEDERAL APPLICABLE REQUIREMENTS**

**The following conditions are federally enforceable.**

**Condition 1: False statement**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 200.3**

**Item 1.1:**

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

**Condition 2: Facility Permissible Emissions**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7.2**

**Item 2.1:**

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

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

CAS No: 007446-09-5

PTE: 190,000 pounds per year



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Name: SULFUR DIOXIDE

CAS No: 0NY210-00-0

PTE: 190,000 pounds per year

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

PTE: 90,000 pounds per year

Name: VOC

**Condition 3: Compliance Demonstration**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7.2**

**Item 3.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

CAS No: 0NY998-00-0 VOC

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 3.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

On an annual basis, beginning one year after the granting of the emission cap, the responsible official shall complete a review of the required records and emission information to verify the facility has operated within the emission limits as follows: 95 tons per year (tpy) sulfur dioxide, 95 tpy nitrogen oxides, and 45 tpy volatile organic compounds (VOC). This review shall include a summary report of the rolling 12-month emissions for each consecutive month of the period and a comparison to the specified limits. These limits prevent the requirement for a Title V permit and the requirements to meet "Reasonable Available Control Technology" (RACT) requirements of 6 NYCRR part 227-2.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 90 days after the reporting period.

The initial report is due 3/31/2005.

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

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**Condition 5: Compliance Demonstration**  
**Effective between the dates of 05/05/2004 and Permit Expiration Date**

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

**Item 5.1:**

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

Emission Unit: U-HEAT1

Emission Unit: U-LAP01

Emission Unit: U-MAIN1

Emission Unit: U-PAC01

Emission Unit: U-WELD1

Emission Unit: U-WWT01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 5.2:**

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. Compliance testing will be conducted at the discretion of the Department. This is applicable to all emission units except COMB1 which are the natural gas and oil fired boilers.

Upper Permit Limit: .05 grains per dscf

Reference Test Method: EPA method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 4: Compliance Demonstration**  
**Effective between the dates of 05/05/2004 and Permit Expiration Date**



**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 4.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 4.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation using USEPA method 22 or equivalent. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this may be zero percent opacity for many or all emission sources), the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

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

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary

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of these instances.

Monitoring Frequency: WEEKLY

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 6: Facility Permissible Emissions**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 227-2.3**

**Item 6.1:**

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: 0NY210-00-0

PTE: 190,000 pounds per year

Name: OXIDES OF NITROGEN

**Condition 7: Compliance Demonstration**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 227-2.3**

**Item 7.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility is restricted to Nitrogen Oxide (NOx) emissions below 100 tpy on a facility wide basis to avoid NOx RACT requirements of 6 NYCRR part 227-2. Monthly fuel use records & emission factors are used to calculate emissions. The limit is based on a 12 month rolling average. Emissions must be calculated monthly and averaged with the previous 11 months to determine compliance.

Work Practice Type: PARAMETER OF PROCESS MATERIAL



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Process Material: NATURAL GAS  
Parameter Monitored: OXIDES OF NITROGEN  
Upper Permit Limit: 95 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 90 days after the reporting period.  
The initial report is due 3/31/2005.  
Subsequent reports are due every 12 calendar month(s).

**Condition 8: Facility Permissible Emissions**  
**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 231-2**

**Item 8.1:**

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

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

CAS No: 0NY998-00-0                      PTE: 90,000 pounds per year  
Name: VOC

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

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 225-1.2(d)**

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-COMB1

Regulated Contaminant(s):  
CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:



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Sulfur content of the fuel oil burned at the facility shall not exceed 1.5% by weight per 6 NYCRR part 225-1.2 (d), table 2. Product data sheet submitted by supplier is sufficient documentation to demonstrate compliance.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FUEL

Parameter Monitored: SULFUR

Upper Permit Limit: 1.5 percent

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 227-1.3(a)**

**Item 10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-COMB1

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity (on a six minute block period) except for one six minute block period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

Operators of air contamination sources that are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

1) Observe the stack(s) or vent(s) once per week for



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visible emissions when firing on oil using USEPA method 22 or equivalent. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

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

- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days, then the Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 22 or 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 22)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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**Condition 11: Compliance Demonstration**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

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

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAC01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility must perform routine filter changes at this emission unit to ensure compliance with the 0.05 grains of particulate /dscf of exhaust gas. Records of filter changes, malfunctions and equipment maintenance must be kept.

Parameter Monitored: PARTICULATES

Upper Permit Limit: .05 grains per dscf

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: ARITHMETIC MEAN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 12: Compliance Demonstration**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.3(a)**

**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAC01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 12.2:**

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Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The VOC contents of paints used in PAC facility may not exceed 3.5 lbs of VOC's per gallon of paint as applied minus water and exempt VOC. All new paints must comply with this limitation prior to use. Paint usage and VOC content records must be maintained in order to verify compliance with the VOC cap as well as the VOC content limit in this regulation. Paint purchase records and MSDS sheets will suffice to demonstrate compliance. Records must be up to date on a monthly basis.

The Permittee must maintain and operate the air pollution control equipment, which includes particulate filter media, at all times the spray paint booths are utilized.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 90 days after the reporting period.

The initial report is due 3/31/2005.

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

**Condition 13: Compliance Demonstration**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 231-2**

**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAC01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL

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**DEVICE PARAMETERS AS SURROGATE**

**Monitoring Description:**

On July 19, 1995 the department issued permits to construct/operate several new sources in emission unit U-PAC01 that required a "cap" to stay below the applicability threshold of 50 tpy of VOC's under 6 NYCRR part 231-2, New Source Review in a Nonattainment Area. The facility was not major for VOC's at the time and the new source was considered major based on potential emissions. This condition requires tracking of VOC emissions from booth's 1, 2 and subsequent curing tunnels using paint usage and VOC content records to determine annual VOC emissions on a monthly basis. A limit of 45 tons per year is imposed in this condition, based on a 12 month rolling average. the 5 ton difference to the 50 tpy applicability threshold of 231-2 is considered a cushion to account for inaccuracies in the compliance method. The facility is also capped below the Title V threshold for VOC's of 50 tpy under 201-7.2. The facility has a whole nor the emissions from booths 1 and 2 can exceed 45 tpy.

Parameter Monitored: VOC

Upper Permit Limit: 45 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 90 days after the reporting period.

The initial report is due 3/31/2005.

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



**STATE ONLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

**Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 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

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law.

**STATE ONLY APPLICABLE REQUIREMENTS**

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

**Condition 14: Contaminant List**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

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

**Item 14.1:**

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

CAS No: 0NY210-00-0  
Name: OXIDES OF NITROGEN

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

CAS No: 007446-09-5  
Name: SULFUR DIOXIDE

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

**Condition 15: Unavoidable noncompliance and violations**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

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

**Item 15.1:**

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



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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 16: Emission Unit Definition**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

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

**Item 16.1:**

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

Emission Unit: U-COMB1

Emission Unit Description:

Emission unit U-COMB1 includes three boilers used for space heat and process steam. The boilers are located in the power house. Two boilers, identified as emission points 3L503 and 3L513, have the dual capability of firing natural gas and Number 6 fuel oil. The third boiler, identified as 3L514, fires only on natural gas.



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Building(s): POWER

**Item 16.2:**

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

Emission Unit: U-HEAT1

Emission Unit Description:

Emission unit U-HEAT1 includes the equipment and processes for the Heat Treat Department of the Rear Axle Plant. In the Heat Treat Department, parts are heat treated in Carburizers, a Carbonitirder, and Temper furnaces, and then washed in a post heat treat spray washer and a phosphate washer.

Building(s): REAR

**Item 16.3:**

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

Emission Unit: U-LAP01

Emission Unit Description:

Emission unit U-LAP01 includes emission point 2H303 which is the lapping compound mix tank located in the Rear Axle Plant.

Building(s): REAR

**Item 16.4:**

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

Emission Unit: U-MAIN1

Emission Unit Description:

Emission unit U-MAIN1 includes emission point 1H393 which is associated with the emissions from the paint spray booth used for maintenance activities.

Building(s): REAR

**Item 16.5:**

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

Emission Unit: U-PAC01

Emission Unit Description:

Emission unit U-PAC01 includes emission points associated with the Paint and Anti-corrosion Facility where manufactured parts are painted in down draft spray booths followed by curing in natural gas-fired drying tunnels. In addition, this emission unit includes a bench for cleaning paint bells and guns.

Building(s): PAC

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**Item 16.6:**

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

Emission Unit: U-WELD1

Emission Unit Description:

Emission unit U-WELD1 includes emission points associated with the automatic welding machines and repair booths for manufactured parts. The welding equipment is located in the Rear Axle Plant.

Building(s): REAR

**Item 16.7:**

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

Emission Unit: U-WWT01

Emission Unit Description:

Emission unit U-WWT01 consists of the processes associated with the Wastewater Treatment Plant including the oil cookers and the acid polymer pretreatment process.

Building(s): WWTP

**Condition 17: Air pollution prohibited**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 17.1:**

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 18: Emission Point Definition By Emission Unit**

**Effective between the dates of 05/05/2004 and Permit Expiration Date**

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

**Item 18.1:**

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

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Emission Unit:	U-COMB1		
Emission Point:	3L503		
Height (ft.):	64	Diameter (in.):	42
			Building: POWER
Emission Point:	3L513		
Height (ft.):	64	Diameter (in.):	42
			Building: POWER
Emission Point:	3L514		
Height (ft.):	64	Diameter (in.):	42
			Building: POWER

**Item 18.2:**

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

Emission Unit:	U-HEAT1		
Emission Point:	2H343		
Height (ft.):	50	Diameter (in.):	30
			Building: REAR
Emission Point:	2H363		
Height (ft.):	50	Diameter (in.):	32
			Building: REAR
Emission Point:	2K343		
Height (ft.):	50	Diameter (in.):	30
			Building: REAR
Emission Point:	2L343		
Height (ft.):	50	Diameter (in.):	30
			Building: REAR
Emission Point:	2M343		
Height (ft.):	50	Diameter (in.):	30
			Building: REAR
Emission Point:	2N343		
Height (ft.):	50	Diameter (in.):	28
			Building: REAR
Emission Point:	2N363		
Height (ft.):	50	Diameter (in.):	21
			Building: REAR



**Item 18.3:**

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

Emission Unit: U-LAP01  
Emission Point: 2H303  
Height (ft.): 55 Diameter (in.): 15 Building: REAR

**Item 18.4:**

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

Emission Unit: U-MAIN1  
Emission Point: 1H393  
Height (ft.): 38 Diameter (in.): 24

**Item 18.5:**

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

Emission Unit: U-PAC01  
Emission Point: PF001  
Height (ft.): 48 Diameter (in.): 108 Building: PAC  
Emission Point: PF003  
Height (ft.): 48 Diameter (in.): 108 Building: PAC  
Emission Point: PF005  
Height (ft.): 39 Diameter (in.): 56 Building: PAC  
Emission Point: PF007  
Height (ft.): 34 Diameter (in.): 10 Building: PAC

**Item 18.6:**

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

Emission Unit: U-WELD1  
Emission Point: 2A123  
Height (ft.): 50 Diameter (in.): 16 Building: REAR



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Emission Point: 2A153 Height (ft.): 50	Diameter (in.): 12	Building: REAR
Emission Point: 2A173 Height (ft.): 50	Diameter (in.): 13	Building: REAR
Emission Point: 3A033 Height (ft.): 49	Diameter (in.): 20	Building: REAR
Emission Point: 3A043 Height (ft.): 50	Diameter (in.): 12	Building: REAR
Emission Point: 3A054 Height (ft.): 49	Diameter (in.): 20	Building: REAR
Emission Point: 3E045 Height (ft.): 50	Diameter (in.): 20	Building: REAR
Emission Point: 3E055 Height (ft.): 50	Diameter (in.): 20	Building: REAR
Emission Point: 3E094 Height (ft.): 67	Diameter (in.): 20	Building: REAR

**Item 18.7:**

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

Emission Unit: U-WWT01		
Emission Point: WTA33 Height (ft.): 48	Diameter (in.): 21	Building: WWTP
Emission Point: WTC43 Height (ft.): 68	Diameter (in.): 24	Building: WWTP

**Condition 19: Process Definition By Emission Unit**

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**Effective between the dates of 05/05/2004 and Permit Expiration Date**

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

**Item 19.1:**

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

Emission Unit: U-COMB1

Process: BL1

Process Description:

Emission unit U-COMB1, Process BL1, is the process of firing natural gas in three, 84 million Btu/hr boilers which are used for space heat and process steam.

Emission Source/Control: 3L503 - Process

Emission Source/Control: 3L513 - Process

Emission Source/Control: 3L514 - Process

**Item 19.2:**

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

Emission Unit: U-COMB1

Process: BL2

Process Description:

Emission unit U-COMB1, Process BL2, is the process of firing Number 6 fuel oil in two, 84 million Btu/hr boilers used for space heat and process stream.

Emission Source/Control: 3L503 - Process

Emission Source/Control: 3L513 - Process

**Item 19.3:**

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

Emission Unit: U-HEAT1

Process: CB1

Source Classification Code: 3-03-009-34

Process Description:

Emission unit U-HEAT1, Process CB1, is the process where parts are heat treated in a carburizer furnace, quenched in hot oil, and spray washed with a detergent.

Emission Source/Control: 2H343 - Process

Emission Source/Control: 2H363 - Process

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Emission Source/Control: 2K343 - Process

Emission Source/Control: 2L343 - Process

Emission Source/Control: 2M343 - Process

Emission Source/Control: 2N343 - Process

Emission Source/Control: 2N363 - Process

**Item 19.4:**

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

Emission Unit: U-LAP01

Process: LD1

Process Description:

Emission unit U-LAP01, Process LD1, is the process of mixing dry silicone carbide powder base oil in a mix tank to form a lapping compound used to process ring & pinion gears.

Emission Source/Control: 2H303 - Control

Control Type: FABRIC FILTER

Emission Source/Control: LAP01 - Process

**Item 19.5:**

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

Emission Unit: U-MAIN1

Process: PS1

Source Classification Code: 4-02-001-01

Process Description:

Emission unit U-MAIN1, Process PS1, is the process of paint spraying in a paint spray booth for maintenance activities.

Emission Source/Control: 1H393 - Control

Control Type: FABRIC FILTER

Emission Source/Control: MAIN1 - Process

**Item 19.6:**

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

Emission Unit: U-PAC01

Process: CT1



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**Process Description:**

Emission unit U-PAC01, Process CT1, is the process where painted axles are dried in a natural gas fired oven to remove solvent and allowed to cure.

Emission Source/Control: PF005 - Process

**Item 19.7:**

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

Emission Unit: U-PAC01

Process: FH1

**Process Description:**

Emission unit U-PAC01, Process FH1, is the exhaust system for the paint bell and gun cleaning bench.

Emission Source/Control: PF007 - Process

**Item 19.8:**

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

Emission Unit: U-PAC01

Process: SB1

**Process Description:**

Emission unit U-PAC01, Process SB1, is the process where axles are painted with low volatile organic compound paints in two down draft spray booths.

Emission Source/Control: PF001 - Control

Control Type: FABRIC FILTER

Emission Source/Control: PF003 - Control

Control Type: FABRIC FILTER

Emission Source/Control: PAC01 - Process

Emission Source/Control: PAC02 - Process

**Item 19.9:**

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

Emission Unit: U-WELD1

Process: AW1

Source Classification Code: 3-09-005-00

**Process Description:**

Emission unit U-WELD1, Process AW1, is the process where welds are made to manufactured parts using automated machinery. Various weld types are utilized, including

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projection welds & the use of self-shielding wire.

Emission Source/Control: 2A123 - Process

Emission Source/Control: 2A153 - Process

Emission Source/Control: 2A173 - Process

Emission Source/Control: 3A033 - Process

Emission Source/Control: 3A043 - Process

Emission Source/Control: 3A054 - Process

Emission Source/Control: 3E045 - Process

Emission Source/Control: 3E055 - Process

Emission Source/Control: 3E094 - Process

**Item 19.10:**

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

Emission Unit: U-WWT01

Process: OC1

Process Description:

Emission unit U-WWT01, Process OC1, is the process where industrial waste oil and wastewater are pretreated. The oil is processed with alum and sulfuric acid in dedicated cookers. Polymer is added to enhance oil/water separation and recovery of oil.

Emission Source/Control: WTA33 - Control

Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: WTC43 - Control

Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: COOKR - Process

Emission Source/Control: MIXER - Process