

New York State Department of Environmental Conservation
Facility DEC ID: 9140200696



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Title V Facility Permit
Permit ID: 9-1402-00696/00007
Effective Date: 10/03/2000 Expiration Date: 10/03/2005

Permit Issued To: UNICELL BODY CO
571 HOWARD ST
BUFFALO, NY 14206-2103

Contact: ROGER*J*MARTIN
571 HOWARD STREET
BUFFALO, NY 14206
(716) 853-8628

Facility: UNICELL BODY COMPANY INC
575 HOWARD STREET
BUFFALO, NY 14206

Contact: ROGER*J*MARTIN
571 HOWARD STREET
BUFFALO, NY 14206
(716) 853-8628

Description:

PERMIT DESCRIPTION
UNICELL BODY COMPANY, INC.
DEC I.D. NO. 9140200696

Unicell Body Company, Inc. (Unicell) is a fiberglass truck body manufacturing and installation facility located at 571 Howard Street in Buffalo, New York in a marginal ozone nonattainment area. Unicell also installs and paints a small portion of steel truck bodies made by other manufacturers, including dump, stake and service bodies. The Facility operates 251 days per year with a daily production rate of approximately four fiberglass van bodies and one steel truck body. This production rate is expected to increase in 2001 and 2002. The Standard Industrial Classification Code for this facility is 3713 - Truck and Bus Bodies. This initial title V permit will result in no changes in facility operations. DEL Liftgates, Inc., 190 Lewis Street, is collocated with Unicell. However, Unicell and DEL Liftgates, Inc. are not commonly owned and share no common stock. DEL Liftgates, Inc., which manufactures and surface coats hydraulic liftgates for the trucking industry, was issued an Air Facility Registration on December 8, 1998 (DEC I.D. No. 9-1402-00860/00002).

Unicell contains two emissions units, A-MOLD and B-PAINT. Emission unit A-MOLD, the main emission unit at the facility, contains all the molding and assembly operations involved in

FINAL



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manufacturing the company's fiberglass van bodies. This emission unit has a single emission point, MAIN. The principal sources of emissions within A-MOLD are the seven fiberglass molds in which the truck bodies and their rear door frames are molded (Emission Source: 7MOLD). This source generates styrene and methyl methacrylate, two hazardous air pollutants (HAPs) which constitute the majority of emissions from the facility. Within 7MOLD, the emitting processes are the robotic application of polyester resin to the molds utilizing a low pressure, airless Venus-Gusmer H.I.S. Chopper Unit (SRE); the manual application of gelcoat to the molds utilizing a low pressure, airless Venus-Gusmer Pro-Series Gelcoater (SGC); the manual application of polyester resin and gelcoat to the molds by brush (HRE, HGC); manual mold cleaning and waxing (CML and WML); the manual application of adhesives to bond reinforcing onto the truck bodies (BHO, BWA); and the cleaning of application equipment with solvents (CEQ). Although there are seven molds available in 7MOLD, only six are used and only one activity is performed at a time. To minimize particulate emissions, Unicell utilizes Purolater 2F two inch disposable fiberglass filters with 90% capture efficiency (Source Control: FMOLD/Emission Source: 7MOLD) on the intake of the exhaust duct for emission point MAIN. The other emission source in this emission unit is the area in which the truck bodies are assembled on the truck chassis (Emission Source: ASSEM). Within ASSEM, the emitting processes are the spraying of small quantities of bottled touch up paint to the truck bodies (STU); the manual application of paint to the truck floors using a roller and brush (HPT); and the manual application of caulk to the van bodies using a caulking gun (HCK). Unicell also operates a fiberglass trimming process which employs a dust collection system to minimize particulate emissions and is vented indoors. Emission Unit B-PAINT is a paint shop in which all of the truck bodies, both fiberglass and steel, are undercoated. Prior to the installation of the steel truck bodies to truck chassis, the area between the cab and the body is painted. Minor body damage is also repaired and painted here. After the body is installed, the truck is sent to another surface coating facility where the remaining portion of the steel truck body is painted. Emission Unit B-PAINT has a single emission source, BOOTH and a single emission point, PAINT. The emitting processes in this emission unit are the manual application of undercoating and paint to the truck bodies utilizing a Titan airless spray system, Model LX50 and an Astro Pneumatic HVLP (high volume, low pressure) spray gun, Model 6GFS, respectively (SPT) and the cleaning of the spray gun with thinners (CPT). To minimize particulate emissions, Unicell utilizes Stackguard high efficiency (99%) disposable fiberglass/polyester filters distributed by Airguard Industries, Inc. (Source Control: FILTR/Emission Source: BOOTH) on the intake of the exhaust duct for emission point PAINT. Unicell also operates seventeen natural gas fired heating units throughout the facility, with heat inputs ranging from 0.034 MMBTU/hr to 1.92 MMBTU/hr, that are exempt from permitting in accordance with 6NYCRR 201-3.2 (c) (1).

The facility-wide emissions of styrene exceeds the major source threshold of 10 tons per year for a single HAP listed in 6NYCRR Subpart 201-6 -Title V Facility Permits and is therefore subject to the provisions of Title V. Two factors have caused estimated styrene emissions to cross the 10 tpy threshold: 1) 1998 changes in the AP42 emissions factors table and 2) an increase in demand, and therefore production, of the fiberglass truck bodies. In addition, Unicell has an annual potential to emit greater than 50 tons of volatile organic compounds (VOCs) from emission sources subject to 6NYCRR Subpart 212.10 - "Reasonably available control technology for major facilities" or 6NYCRR Part 228 - "Surface Coating Processes", Section 228.8, Table 2. Both requirements have an applicability threshold of 50 tons per year (tpy) based on the potential to emit VOCs from all sources at the facility. Unicell has chosen to avoid being subject to the control requirements specified in Subpart 212.10 and Subpart 228.8 by limiting the amount of VOC's emitted from the facility to 49 tons per year determined by summing the individual monthly VOC emissions during any consecutive 12-month period. Emission points MAIN and PAINT are subject to the requirements of 6NYCRR212.4 (c) which limits the concentration of particulates in the exhaust to less than 0.05 grains



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per dry standard cubic foot and 6NYCRR211.6(a) which limits the average opacity of the emissions during any six consecutive minutes to less than 20%. The permit specifies special operating conditions, recordkeeping and reporting required to verify compliance with these limits. The facility is currently in compliance with all requirements.

The United States Environmental Protection Agency (USEPA) is currently developing a National Emission Standard for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Manufacturing that will require the application of maximum achievable control technology (MACT) to reduce emissions from the molding processes. The proposed rule is expected in the year 2000, with promulgation one year later. Since Unicell has the potential to emit 10 or more tons per year of styrene, they must comply with these requirements in accordance with the NESHAP when promulgated.

The Title V permit contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission units and emission points. Appendix A contains a list of exempt activities as defined by 6NYCRR 201-3.2.

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
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other 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, agents, and assigns for all claims, suits, actions, damages, and costs of every name and description, arising out of or resulting from the permittee's undertaking of activities or operation and maintenance of the facility or facilities authorized by the permit in compliance or non-compliance with the terms and conditions of the permit.

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 ******

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(a)

Item 3.1:

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

Item 3.2:

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

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

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for

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modification, suspension or revocation include:

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

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 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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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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571 HOWARD ST
BUFFALO, NY 14206-2103

Contact: ROGER*J*MARTIN
571 HOWARD STREET
BUFFALO, NY 14206
(716) 853-8628

Facility: UNICELL BODY COMPANY INC
575 HOWARD STREET
BUFFALO, NY 14206

Contact: ROGER*J*MARTIN
571 HOWARD STREET
BUFFALO, NY 14206
(716) 853-8628

Authorized Activity By Standard Industrial Classification Code:
3713 - TRUCK AND BUS BODIES

Permit Effective Date: 10/03/2000

Permit Expiration Date: 10/03/2005



LIST OF CONDITIONS

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- 46 Compliance Certification (EU=0-AMOLD,EP=0MAIN)
- 47 Emissions from two or more devices through one emission point
- 48 Capped sources of VOC and NOx not subject to 212.9(b) for non A-rated contaminants
- 49 Compliance Certification (EU=B-PAINT,EP=PAINT)
- 50 Compliance Certification (EU=B-PAINT,EP=PAINT)

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FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 1: Definitions Applicable To This Permit
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 200.1

Item 1.1:

The definitions found in Parts 200 and 201 apply throughout this permit. Specific definitions used in this permit and their meanings include:

1. "Act" refers to the Federal Clean Air Act, 42 U.S.C. Section 7401, et seq., as amended by Public Law 101-549, November 15, 1990.
2. "Administrator" refers to the Administrator of the United States Environmental Protection Agency or designee.
3. "Department" refers to the New York State Department of Environmental Conservation.

Condition 2: False statement
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 200.3

Item 2.1:

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

Condition 3: Sealing
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 200.5

Item 3.1:

(a) The commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the commissioner issued in the case of the violation. Sealing means labelling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

(b) No person shall operate any air contamination source sealed by the commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.



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

Condition 4: Acceptable ambient air quality
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 200.6

Item 4.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the commissioner shall specify the degree and/or method of emission control required.

Condition 5: Maintenance of equipment
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 200.7

Item 5.1:

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

Condition 6: Unpermitted Emission Sources
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 6.1:

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Condition 7: Unavoidable Noncompliance and Violations
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-1.4



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Item 7.1:

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

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

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

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

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

Condition 8: Emergency Defense
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 8.1:

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed,



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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.

Condition 9: Recycling and Salvage
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 9.1:

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

Condition 10: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 10.1:

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

Condition 11: Public Access to Recordkeeping for Title V facilities
Effective between the dates of 10/03/2000 and 10/03/2005

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

Item 11.1:



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The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Condition 12: Exempt and Trivial Activities Applicability
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-3.1(a)

Item 12.1:

If the facility owner and/or operator performs any of the exempt and trivial activities listed in 6 NYCRR Part 201-3.2(c) or 201-3.3(c), such activities are exempt from the permitting provisions of 6 NYCRR Part 201-5, but not from other Parts of 6 NYCRR Chapter III, or from applicable permitting requirements of local air pollution control agencies.

Condition 13: Proof of Eligibility
Effective between the dates of 10/03/2000 and 10/03/2005

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

Item 13.1:

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

Condition 14: Proof of Eligibility
Effective between the dates of 10/03/2000 and 10/03/2005

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

Item 14.1:

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

Condition 15: Applicable Criteria, Limits, Terms, Conditions and Standards



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Applicable Federal Requirement: 6NYCRR 201-6.

Item 15.1:

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

- i. Any reporting requirements and operations under an accidental release plan, response plan, and compliance plan as approved as of the date of the permit issuance, or
- ii. Any support documents submitted as a part of the permit application for this facility as accepted and approved as of the date of permit issuance.

Any noncompliance with the federally-enforceable portions of this permit constitutes a violation of the federal Clean Air Act and will be grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

Item 15.2:

Any document, including reports, required by the federally-enforceable portions of this permit shall contain a certification by the responsible official for this facility as set forth in Section 201-6.3 that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

Condition 16: Cessation or Reduction of Permitted Activity Not a Defense
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 16.1:

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Condition 17: Compliance Requirements
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 17.1:

The following information must be included in any required compliance monitoring records and reports:

- i. The date, place and time of sampling or measurements;
- ii. The date(s) analyses were performed;
- iii. The company or entity that performed the analyses;



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iv. The analytical techniques or methods used including quality assurance and quality control procedures if required;

v. The results of such analyses including quality assurance data where required; and

vi. The operating conditions as existing at the time of sampling or measurement;

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by the responsible official, consistent with Section 201-6.3 of Part 201.

Item 17.2:

The permittee shall comply with the approved compliance schedule for this permit if such a schedule is a part of this permit. Risk management plans must be submitted to the Administrator if required by Section 112(r) of the Clean Air Act for this facility.

Item 17.3:

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Federally-Enforceable Requirements

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 18.1:

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.

Condition 19: Fees

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 19.1:

The permittee shall pay the required fees associated with this permit.



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Condition 20: Monitoring, Related Recordkeeping and Reporting Requirements

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 20.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 21: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 21.1:

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not relieve the permittee from the requirement to comply with any condition contained in this permit.

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Condition 22: Permit Shield

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 22.1:

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield. For those facilities for which a permit shield has been granted, compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary



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abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Condition 23: Property Rights
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 23.1:

This permit does not convey any property rights of any sort or any exclusive privilege.

Condition 24: Reopening for Cause
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 24.1:

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.



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Item 24.2:

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Item 24.3:

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Condition 25: Right to Inspect

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 25.1:

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 26: Severability

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 26.1:

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Condition 27: Emission Unit Definition

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 27.1:

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



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Emission Unit: 0-AMOLD

Emission Unit Description:

This is the main emission unit in the facility. It contains all the molding and assembly operations involved in manufacturing the company's fiberglass van bodies. This emission unit has a single emission point, MAIN. Particulate emissions are controlled via disposable fiberglass panel filters with 90% capture efficiency.

The largest emissions source within this emission unit and in the entire facility is 7MOLD which consists of seven fiberglass molds in which the truck bodies and their rear doorframes are molded. Within 7MOLD, the emitting processes are: 1) mold cleaning and waxing (CML, WML); 2) the application of polyester resin and polyester gelcoat to the molds, both by airless spray equipment and by brush (SRE, SGC, HRE, HGC); 3) the application of adhesives to bond reinforcing into the truck bodies (BHO, BWA); 4) the cleaning of application equipment with solvents (CEQ).

The other emissions source in this emission unit is located in the area in which the truck bodies are assembled on the truck chassis (ASSEM). Within ASSEM, the emitting processes are the manual application of caulking with a caulking gun (HCK), the manual application of truck floor paint with a roller and brush (HPT) and the spraying of small quantities of bottled touch up paint to blemishes on the truck bodies (STU).

Building(s): 575HOWARD
CHASPREP
INSTALL
MOLDSHOP

Item 27.2:

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

Emission Unit: B-PAINT

Emission Unit Description:

This emission unit consists of a paint shop in which truck bodies made by other manufacturers, including dump, stake and service bodies are painted and installed. All truck bodies, including those that are utilized for the van bodies, are undercoated. This emission unit has a single emission point, PAINT. Particulate emissions are controlled via disposable fiberglass/polyester panel filters with 99% capture efficiency.



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The emitting processes in this emission unit are: 1) SPT: The application of paint to truck bodies with an air atomized spray gun and the application of undercoat to truck chassis with an airless spray gun; and 2) CPT: The cleaning of the spray guns with thinners.

Building(s): 575HOWARD

Condition 28: Compliance Certification
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

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All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)
Reports due 30 days after every 6 calendar months (January - June, July - December)

Condition 29: Compliance Certification
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Compliance certifications shall contain the following information:

- the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
- and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

Compliance certifications shall be submitted annually. Certification reports are due 30 days after the end of the calendar year.

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All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
50 Wolf Road
Albany, NY 12233-3258

Reporting Requirements: ANNUALLY (CALENDAR YEAR)
Reports due by January 30th for previous calendar year

Condition 30: Required emissions tests
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 30.1:

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

Condition 31: Compliance Certification
Effective between the dates of 10/03/2000 and 10/03/2005



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Applicable Federal Requirement: 6NYCRR 202-2.1

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR YEAR)

Reports due by April 15th for previous calendar year

Condition 32: Recordkeeping requirements

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 32.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 33: Visible emissions limited.

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 211.3

Item 33.1:

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

Condition 34: Facility Permissible Emissions

Effective between the dates of 10/03/2000 and 10/03/2005



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Applicable Federal Requirement: 6NYCRR 212.10

Item 34.1:

The sum of emissions from the emission units specified in this permit shall not exceed the following Potential To Emit (PTE) rate for each regulated contaminant:

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

PTE: 98,000 pounds per year

Condition 35: Compliance Certification

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 212.10

Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant:

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

Item 35.2:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Unicell Body Company, Inc. located at 571 Howard Street, Buffalo, New York has an annual potential to emit 70 tons of volatile organic compounds (VOCs) from emission sources subject to 6NYCRR Subpart 212.10 - "Reasonably available control technology for major facilities" or 6NYCRR Part 228 - "Surface Coating Processes", Section 228.8, Table 2.

Both requirements have an applicability threshold of 50 tons per year (tpy) based on the potential to emit VOCs from all sources at the facility. As such, the Facility must demonstrate compliance with the control requirements specified in Subpart 212.10 and Subpart 228.8 or accept limitations on VOC emissions below the applicability threshold of 50 tpy.

The Facility has chosen to accept limitations to restrict the amount of VOC's emitted from the facility and, therefore, does not need to comply with the VOC control requirements. This condition summarizes special operating conditions to limit the annual actual emissions of VOCs to

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49.0 tpy.

Facility-wide emissions of VOCs shall not exceed the VOC emission rate of 49.0 tpy as determined by summing the individual monthly VOC emissions during any consecutive 12-month period. The processes contributing to the facility VOC emissions include SRE, SGC, CEQ, CML, BHO, WML, BWA, HRE, HGC, HPT, and HCK contained in Emission Unit A-MOLD and processes CPT and SPT contained in Emission Unit B-PAINT. The Facility shall keep and maintain records for each process to determine actual VOC emissions based on verifiable data. These records shall include the following information:

- 1) A current list of all coatings, solvents, inks and adhesives in use, including trivial and/or exempt activities. This list shall include information on the manufacturer, brand, product name or code, VOC content in grams per liter or pounds per gallon, or manufacturer's product specifications, material VOC content reports, or laboratory analyses providing this information;
- 2) A description of any equipment used during and after coating/solvent application, including type, make and model; maximum design process rate or throughput; control device(s) type and description (if any); and a description of the coating/solvent application/drying method(s) employed;
- 3) A monthly log of the consumption of each solvent (including solvents used in clean-up and surface preparation), coating, ink, and adhesive used;
- 4) All purchase orders, invoices, usage and production records and other documents to support information in the monthly log;
- 5) all calculations used to determine the monthly emissions ; and
- 6) On an annual basis, beginning one year after the granting of the emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the 49 ton per year limit imposed by the emissions cap. This shall include a VOC summary report which shall list the coatings and solvents used with the corresponding VOC contents in lb/gal, the quantities used monthly in

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gallons, if applicable, factors used to calculate VOC emissions, the monthly VOC emissions with the monthly total, the rolling 12-month VOC emissions for each consecutive month of the period and a comparison to the 49 tpy limit. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported. Submission of the annual certification for the VOC RACT CAP under 6NYCRR212.10 shall satisfy the requirements for certification of the VOC RACT CAP under 6NYCRR228.8, since the requirements are equivalent.

All records and reports shall be maintained on-site for five years in a form suitable and readily available for expeditious inspection and review and shall be submitted to the Department upon request. Representatives of the Department shall be permitted entrance to the Facility, during reasonable business hours, to perform inspections, review emission records and obtain samples for the purpose of determining compliance.

To reduce unnecessary VOC emissions to the environment, Unicell shall also comply with the following handling, storage and disposal requirements for VOC containing compounds: (1) do not use open containers to store or dispose of cloth or paper impregnated with VOCs and/or solvents; (2) do not store spent or fresh VOCs and/or solvents to be used for surface preparation, cleanup or coating removal in open containers; (3) do not use VOCs and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere; (4) do not use open containers to store or dispense surface coatings or solvents unless production, sampling, maintenance or inspection procedures require operational access. This does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate including, but are not limited to, spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters; and (5) never use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

An exceedance of the VOC emission limit, failure to fulfill the recordkeeping and reporting requirements and/or failure to maintain the good housekeeping and work practices specified in this monitoring condition



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constitutes a violation of 6NYCRR212 and 6NYCRR228.
Exceedance of the VOC limit must be reported to the
Department within 30 days of occurrence.

Process Material: COATING

Parameter Monitored: VOC's

Upper Limit of Monitoring: 49.0 tons per year

Monitoring Frequency: AS REQUIRED - SEE MONITORING

DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 11/01/2001 for the period 10/03/2000 through 10/02/2001

Condition 36: Sampling and Monitoring
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 212.11(a)

Item 36.1:

The owner and/or operator of this facility, if required by the department to conduct stack testing to demonstrate compliance with 6 NYCRR Part 212, must comply with notification requirements and conduct capture efficiency and/or stack testing using acceptable procedures pursuant to 6 NYCRR Part 202.

Condition 37: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 215.

Item 37.1:

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

Condition 38: Facility Permissible Emissions
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 228.8

Item 38.1:

The sum of emissions from the emission units specified in this permit shall not exceed the following Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0

PTE: 98,000 pounds per year

Name: VOC

Condition 39: Compliance Certification
Effective between the dates of 10/03/2000 and 10/03/2005



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Applicable Federal Requirement: 6NYCRR 228.8

Item 39.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

Item 39.2:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To avoid the requirements of 6NYCRR212.10, Unicell Motor Body Company chose to limit the facility's potential to emit volatile organic compounds (VOCs) to 49.0 tons per year based on a 12-month rolling total. As a result, the facility has eliminated the need to comply with the control requirements specified under 6NYCRR228.8 which is applicable for coating processes that have the potential to emit 50 tons of VOC's per year or greater. The capping requirements specified for the facility under 6NYCRR212.10, shall satisfy the capping requirements for the facility under 6NYCRR228.8.

Process Material: COATING

Parameter Monitored: VOC's

Upper Limit of Monitoring: 49.0 tons per year

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 11/01/2001 for the period 10/03/2000 through 10/02/2001

Condition 40: Recycling and Emissions Reduction

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 40.1:

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.

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

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

Condition 41: Emission Point Definition By Emission Unit
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 41.1:

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

Emission Unit: 0-AMOLD

Emission Point: 0MAIN

Height (ft.): 51 Length (in.): 67 Width (in.): 48
NYTMN (km.): 4754.92 NYTME (km.): 186.929 Building: MOLDSHOP

Item 41.2:

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

Emission Unit: B-PAINT

Emission Point: PAINT

Height (ft.): 28 Diameter (in.): 11
NYTMN (km.): 4754.92 NYTME (km.): 186.929 Building: 575HOWARD

Condition 42: Process Definition By Emission Unit
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 201-6.

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Item 42.1:

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

Emission Unit: 0-AMOLD

Process: BHO

Source Classification Code: 3-08-007-04

Process Description:

This is the application of urethane adhesive, betaseal, to the interior structure of the truck body. The tool used is a mechanical applicator.

Emission Source/Control: 7MOLD - Process

Item 42.2:

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

Emission Unit: 0-AMOLD

Process: BWA

Source Classification Code: 4-02-016-99

Process Description:

This is the manual application of polyester putty to the front wall reinforcing of a truck body. The tool used is a putty knife.

Emission Source/Control: 7MOLD - Process

Item 42.3:

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

Emission Unit: 0-AMOLD

Process: CEQ

Source Classification Code: 3-08-007-99

Process Description:

This is the cleaning of spray and other application equipment using acetone and lacquer thinners. The tools used are brushes and rags.

Emission Source/Control: 7MOLD - Process

Item 42.4:

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

Emission Unit: 0-AMOLD

Process: CML

Source Classification Code: 3-08-007-02

Process Description:

This is the cleaning of a fiberglass mold using mold release TR 210, 211. The tool used is a rag.

Emission Source/Control: 7MOLD - Process

Item 42.5:

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

Emission Unit: 0-AMOLD

Process: HCK

Source Classification Code: 4-02-016-99

Process Description:

This is the application of caulking, all-pro acrylic, to the floor/wall joint of a truck body. The tool used is a caulking gun.

Emission Source/Control: ASSEM - Process

Item 42.6:

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

Emission Unit: 0-AMOLD

Process: HGC

Source Classification Code: 3-08-007-21

Process Description:

This is the manual application of gelcoat, including catalyst, to a fiberglass mold. The tool used is a paintbrush.

Emission Source/Control: 7MOLD - Process

Item 42.7:

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

Emission Unit: 0-AMOLD

Process: HPT

Source Classification Code: 4-02-016-99

Process Description:

This is the manual application of paint to the floor of a truck body. The tool used is a paint roller.

Emission Source/Control: ASSEM - Process

Item 42.8:

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

Emission Unit: 0-AMOLD

Process: HRE

Source Classification Code: 3-08-007-23

Process Description:

This is the manual application of polyester resin, including catalyst, to a fiberglass mold. The tools used are a paintbrush and a steel roller.

Emission Source/Control: 7MOLD - Process

Item 42.9:

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

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Emission Unit: 0-AMOLD

Process: SGC

Source Classification Code: 3-08-007-22

Process Description:

This is the spray application of gelcoat, including catalyst, to a fiberglass mold. The tool used is a low pressure, airless Venus-Gusmer Pro-Series Gelcoater spray gun. Approximately four molds are gelcoated each day, utilizing 0.75-1.5 hours per unit for the application (3-6 hours total spraying time). Gelcoat and resin can be applied to separate molds simultaneously.

Emission Source/Control: FMOLD - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: 7MOLD - Process

Item 42.10:

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

Emission Unit: 0-AMOLD

Process: SRE

Source Classification Code: 3-08-007-24

Process Description:

This is the robotic spray application of polyester resin, including catalyst, to a fiberglass mold. The tool used is a low pressure, airless Venus-Gusmer H.I.S. Chopper spray gun. Approximately four molds are coated each day, utilizing 0.75-1.5 hours per unit for the application (3-6 hours total spraying time). Gelcoat and resin can be applied to separate molds simultaneously.

Emission Source/Control: FMOLD - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: 7MOLD - Process

Item 42.11:

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

Emission Unit: 0-AMOLD

Process: STU

Source Classification Code: 4-02-016-20

Process Description:

This is the touch up of small blemishes in the truck chassis using small aerosol spray cans.

Emission Source/Control: ASSEM - Process



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Item 42.12:

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

Emission Unit: 0-AMOLD

Process: WML

Source Classification Code: 3-08-007-99

Process Description:

This is the application of wax, paste wax TR 100 to a fiberglass mold. The tool used is a rag.

Emission Source/Control: 7MOLD - Process

Item 42.13:

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

Emission Unit: B-PAINT

Process: CPT

Source Classification Code: 4-02-016-05

Process Description:

This is the cleaning of the paint spray gun using thinners.

Emission Source/Control: BOOTH - Process

Item 42.14:

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

Emission Unit: B-PAINT

Process: SPT

Source Classification Code: 4-02-016-07

Process Description:

This is the application of various types of paint to the area between the body and cab of stake and dump trucks and for specialty painting of the wheels and bumpers for some of the manufactured cube vans using an Astro Pneumatic HVLP, Model 6GFS spray gun. It is also the application of undercoating to cube vans using a Titan airless spray system, Model LX50. These activities are not carried out simultaneously.

Emission Source/Control: FILTR - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: BOOTH - Process

**Condition 43: Emissions from two or more devices through one emission point
Effective between the dates of 10/03/2000 and 10/03/2005**

Applicable Federal Requirement: 6NYCRR 212.5(a)

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Item 43.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 43.2:

Where air contaminants from two or more devices or contrivances are emitted to the outdoor atmosphere through a single emission point, the permissible emission rate or degree of air cleaning required is determined by using the sum of the process weights or emission rate potentials for all such devices or contrivances.

**Condition 44: Capped sources of VOC and NOx not subject to 212.9(b) for non A-rated contaminants
Effective between the dates of 10/03/2000 and 10/03/2005**

Applicable Federal Requirement: 6NYCRR 212.5(f)

Item 44.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 44.2:

Owners and/or operators of facilities which have limited the facility's annual potential to emit nitrogen oxides or volatile organic compounds below applicability levels through federally and state enforceable special conditions in permits to construct and/or certificates to operate under the provisions of section 212.10(d) of this Part must maintain annual actual emissions below these limitations. Nitrogen oxide and volatile organic compound emission points at these facilities are not subject to the control requirements in section 212.9(b) of this Part if the emissions are not given an A rating.

**Condition 45: Compliance Certification
Effective between the dates of 10/03/2000 and 10/03/2005**

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD Emission Point: 0MAIN

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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



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The spray booth, application equipment and control equipment shall be utilized and maintained in accordance with manufacturer's specifications. Spray application shall be carried out to minimize overspray and particulate emissions. Filters shall cover the entire exhaust opening and shall be changed regularly to ensure maximum capture efficiency. To verify maintenance practices filter changes shall be recorded in a log book and purchase orders/invoices shall be kept and made readily available for review by representatives from the NYSDEC or USEPA upon request. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Limit of Monitoring: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 46: Compliance Certification

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD Emission Point: 0MAIN

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

Item 46.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.

The maintenance procedure applicable to this permit for compliance with this opacity requirement will include the

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following:

1. If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this is zero percent opacity if a Method 9 certified visible emissions evaluator is not on site), the facility owner shall determine the cause immediately and make the necessary correction. The facility owner and/or operator will observe all emission points or other sources of air pollution daily during daylight hours, except during conditions of extreme weather (fog, snow, rain), to monitor for unusual opacity conditions. The records of these observations including explanations for days when weather conditions are prohibitive will be recorded in a bound log book at the facility and shall be available for inspection by Department representatives upon request. Records will be maintained for a period of at least five years.
2. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the facility owner will conduct a Method 9 assessment to determine the degree of opacity.
3. If the opacity is determined to exceed the 20% limit, the facility will be determined to be in violation, will remedy the problem, and will contact the Department. The Department reserves the right to perform a Method 9 opacity evaluation. The provisions of Part 201-1.4 shall apply.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 47: Emissions from two or more devices through one emission point
Effective between the dates of 10/03/2000 and 10/03/2005**

Applicable Federal Requirement: 6NYCRR 212.5(a)

Item 47.1:

This Condition applies to Emission Unit: B-PAINT

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Item 47.2:

Where air contaminants from two or more devices or contrivances are emitted to the outdoor atmosphere through a single emission point, the permissible emission rate or degree of air cleaning required is determined by using the sum of the process weights or emission rate potentials for all such devices or contrivances.

**Condition 48: Capped sources of VOC and NOx not subject to 212.9(b) for non A-rated contaminants
Effective between the dates of 10/03/2000 and 10/03/2005**

Applicable Federal Requirement: 6NYCRR 212.5(f)

Item 48.1:

This Condition applies to Emission Unit: B-PAINT

Item 48.2:

Owners and/or operators of facilities which have limited the facility's annual potential to emit nitrogen oxides or volatile organic compounds below applicability levels through federally and state enforceable special conditions in permits to construct and/or certificates to operate under the provisions of section 212.10(d) of this Part must maintain annual actual emissions below these limitations. Nitrogen oxide and volatile organic compound emission points at these facilities are not subject to the control requirements in section 212.9(b) of this Part if the emissions are not given an A rating.

**Condition 49: Compliance Certification
Effective between the dates of 10/03/2000 and 10/03/2005**

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PAINT Emission Point: PAINT

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

Item 49.2:

Compliance Certification 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. The spray booth, application equipment and control equipment shall be utilized and maintained in accordance



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with manufacturer's specifications. Spray application shall be carried out to minimize overspray and particulate emissions. Filters shall cover the entire exhaust opening and shall be changed regularly to ensure maximum capture efficiency. To verify maintenance practices filter changes shall be recorded in a log book and purchase orders/invoices shall be kept and made readily available for review by representatives from the NYSDEC or USEPA upon request. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Limit of Monitoring: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 50: Compliance Certification
Effective between the dates of 10/03/2000 and 10/03/2005

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PAINT Emission Point: PAINT

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

Item 50.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.

The maintenance procedure applicable to this permit for compliance with this opacity requirement will include the following:

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1. If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this is zero percent opacity if a Method 9 certified visible emissions evaluator is not on site), the facility owner shall determine the cause immediately and make the necessary correction. The facility owner and/or operator will observe all emission points or other sources of air pollution daily during daylight hours, except during conditions of extreme weather (fog, snow, rain), to monitor for unusual opacity conditions. The records of these observations including explanations for days when weather conditions are prohibitive will be recorded in a bound log book at the facility and shall be available for inspection by Department representatives upon request. Records will be maintained for a period of at least five years.

2. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the facility owner will conduct a Method 9 assessment to determine the degree of opacity.

3. If the opacity is determined to exceed the 20% limit, the facility will be determined to be in violation, will remedy the problem, and will contact the Department. The Department reserves the right to perform a Method 9 opacity evaluation. The provisions of Part 201-1.4 shall apply.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 51: General Provisions

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable State Requirement: 6NYCRR 201-5.

Item 51.1:

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

Item 51.2:

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

Item 51.3:

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.

Condition 52: Contaminant List

Effective between the dates of 10/03/2000 and 10/03/2005

Applicable State Requirement: 6NYCRR 201-5.3(b)

Item 52.1:

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

CAS No: 0NY998-00-0

Name: VOC

CAS No: 0NY075-00-0

Name: PARTICULATES

Condition 53: Air pollution prohibited

Effective between the dates of 10/03/2000 and 10/03/2005

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Applicable State Requirement: 6NYCRR 211.2

Item 53.1:

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.