



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1430-00122/00020
Effective Date: 12/22/2015 Expiration Date: 12/21/2025

Permit Issued To: INGERSOLL RAND CO
800 E BEATTY ST
DAVIDSON, NC 28035-7703

Contact: DAVID SHEPPARD
Ingersoll Rand Engineered Centrifugal Compression
3101 BROADWAY
BUFFALO, NY 14225-0209
(716) 891-3881

Facility: INGERSOLL RAND ENGINEERED CENTRIFUGAL COMPRESSION
3101 BROADWAY
CHEEKTOWAGA, NY 14225-0209

Contact: DAVID SHEPPARD
Ingersoll Rand Engineered Centrifugal Compression
3101 BROADWAY
BUFFALO, NY 14225-0209
(716) 891-3881

Description:
The Ingersoll Rand Engineered Centrifugal Compression (IRCO) facility manufactures centrifugal air compressors. Manufacturing processes regulated by this permit include electroplating, surface coating, packaging, and metal machining and cutting. Exempt activities include solvent degreasing, abrasive metal cleaning, welding, and natural gas combustion. The facility was previously authorized to operate via an Air Facility Registration, but due to recent changes to 6NYCRR Part 201-4, must now obtain an Air State Facility Permit due to exceedance of Subpart 201-9 thresholds for Persistent, Bioaccumulative, and Toxic (PBT) compounds.

The facility is organized into four emission units:

- U-00001 - This emission unit consists of the hard chrome electroplating process. Emissions are controlled using a packed bed scrubber. The process is subject to National Emission Standards for Hazardous Air Pollutants 40CFR63 Subpart N and the particulate and opacity limits in 6NYCRR Part 212.
- U-00002 - This emission unit includes four paint booths. Primer and paint are applied using HVLP spray guns. Emissions are minimized by



high transfer efficiency HVLP spray guns and, when possible, the use of low VOC coatings. Particulate emissions are controlled using panel filters. This process is subject to 6NYCRR Subpart 228-1. U-00003 - This emission unit included the foam packing process that includes batch mixing of a polymeric polyisocyanate packaging material. The material is dispensed into packing crates to protect manufactured parts during shipment. Emissions from mixing and dispensing vent inside the building. The process is subject to the particulate and opacity limits in 6NYCRR Part 212.

- U-00004 - This emission unit consists of non-exempt machine tools, including one CNC boring machine and one CNC plasma cutter. The process is subject to the particulate and opacity limits in 6NYCRR Part 212.

This permit establishes a lesser degree of control per 6 NYCRR Part 228-1.5(e) for one specific extreme performance coating. A process-specific Reasonably Available Control Technology (RACT) analysis successfully demonstrated the technical and economic infeasibility of controlling volatile organic compound (VOC) emissions from the one specific extreme performance coating.

IRCO will limit emissions for purposes of capping out of the major facility applicability requirements of 6NYCRR Part 201-6. Specifically, actual emissions of volatile organic compound (VOC) emissions will be less than 49.5 tons per year, total hazardous air pollutants (HAPs) are limited to less than 24.5 tons per year, and each individual HAP is limited to less than 9.5 tons per year. IRCO is required to annually certify continuous compliance with the emission limits established in this permit through use of a 12-month rolling total emission rate calculated on a monthly basis.

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 14203-2915

Authorized Signature: _____ Date: ___ / ___ / ____





Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

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



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.3:

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

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

Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority 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 application for permit modification or renewal-REGION 9 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (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 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-1430-00122/00020

Facility DEC ID: 9143000122



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: INGERSOLL RAND CO
800 E BEATTY ST
DAVIDSON, NC 28035-7703

Facility: INGERSOLL RAND ENGINEERED CENTRIFUGAL COMPRESSION
3101 BROADWAY
CHEEKTOWAGA, NY 14225-0209

Authorized Activity By Standard Industrial Classification Code:
3563 - AIR AND GAS COMPRESSORS

Permit Effective Date: 12/22/2015

Permit Expiration Date: 12/21/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-7.1: Facility Permissible Emissions
- *2 6 NYCRR 201-7.1: Capping Monitoring Condition
- *3 6 NYCRR 201-7.1: Capping Monitoring Condition
- 4 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 5 6 NYCRR 212-1.6 (a): Compliance Demonstration

EU=U-00001

- 6 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 7 6 NYCRR 228-1.5 (e): Compliance Demonstration
- 8 40CFR 63.342(c)(1)(ii), Subpart N: Compliance Demonstration
- 9 40CFR 63.342(c)(1)(v), Subpart N: Compliance Demonstration
- 10 40CFR 63.342(f), Subpart N: Compliance Demonstration
- 11 40CFR 63.343, Subpart N: Compliance Demonstration
- 12 40CFR 63.343(a)(5), Subpart N: Compliance deadline for small hard chromium electroplating facilities that exceed the small facility threshold in the future
- 13 40CFR 63.343(c)(2), Subpart N: Compliance Demonstration
- 14 40CFR 63.346(b), Subpart N: Compliance Demonstration
- 15 40CFR 63.347(a), Subpart N: Reporting Requirements
- 16 40CFR 63.347(d), Subpart N: Notification of performance test
- 17 40CFR 63.347(e)(2), Subpart N: Required content for notification of compliance status
- 18 40CFR 63.347(h), Subpart N: Compliance Demonstration

EU=U-00002

- 19 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 20 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 21 6 NYCRR 228-1.3 (c): Compliance Demonstration
- 22 6 NYCRR 228-1.3 (c): Compliance Demonstration
- 23 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 24 6 NYCRR 228-1.3 (e): Surface Coating- application requirements
- 25 6 NYCRR 228-1.4 (b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 26 ECL 19-0301: Contaminant List
- 27 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 28 6 NYCRR Subpart 201-5: Emission Unit Definition
- 29 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 30 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 31 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 32 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 33 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



NOTE: * preceding the condition number indicates capping.



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 - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

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

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

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.



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

Item F: Recycling and Salvage - 6 NYCRR 201-1.7

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

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

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

Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

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

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

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

Item J: Required Emission Tests - 6 NYCRR 202-1.1



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

Item K: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item L: Permit Exclusion - ECL 19-0305

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

Item M: 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: Facility Permissible Emissions



Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 1.1:

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: 0NY100-00-0 PTE: 45,000 pounds per year
Name: TOTAL HAP

CAS No: 0NY998-00-0 PTE: 95,000 pounds per year
Name: VOC

Condition 2: Capping Monitoring Condition

Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 2.1:

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

6 NYCRR 201-6.1

Item 2.2:

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

Item 2.3:

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

Item 2.4:

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

Item 2.5:

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

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usage of coatings, adhesives, solvents, and other VOC containing products and the VOC content of the products. The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records and VOC content of products. All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 99000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 4: Air pollution prohibited
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 4.1:

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 5: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 5.1:

The Compliance Demonstration activity will be performed for the facility:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00122/00020

Facility DEC ID: 9143000122



The Compliance Demonstration applies to:

Emission Unit: U-00001

Emission Unit: U-00003

Emission Unit: U-00004

Item 5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per



cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Reference Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement: 6 NYCRR 228-1.5 (e)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A lesser degree of control has been established per Part 228-1.5(e) for one specific extreme performance coating (CP-211) used at the Ingersoll Rand Engineered Centrifugal Compression (IRCO) facility. IRCO submitted a detailed process-specific Reasonably Available Control Technology (RACT) analysis dated February 2014 which was completed in accordance with the "NYSDEC DAR-20 Economic and Technical Analysis for Reasonably Available Control Technology (RACT)" policy and 6NYCRR Part 228-1.5(e).

The RACT analysis successfully demonstrated the technical and economic infeasibility of controlling volatile organic compound (VOC) emissions from CP-211 via 1.) utilizing complaint coatings, 2.) utilizing demonstrated and proven control techniques including limiting VOC content and use of high transfer efficiency spray guns and 3.) utilizing add-on control technology such as carbon adsorption and thermal/catalytic oxidation. The economic feasibility analysis for thermal or catalytic oxidation showed a cost of control of approximately \$250,000 or \$565,000



respectively per ton, which are 57 and 130 times the cost feasibility threshold.

To maintain compliance with the process-specific VOC RACT requirements, IRCO shall:

- Limit VOC emissions from CP-211 to less than 2 tons per year on a rolling twelve month basis. The emission limit represents the maximum emission rate of CP-211 based on the 600 gallons per year usage factor used in the economic feasibility analysis.
- Use only HVLP spray guns to apply CP-211,
- Adhere to the general operating practices in 6NYCRR Part 228-1.3, and
- Continue to assess the feasibility of using an alternative low-VOC substitute coating or non-VOC reducer.

Emissions subject to this RACT requirement shall be calculated using a combination of material usage and production records of material processed by the equipment.

The facility shall submit to the Department an annual emission report for the previous calendar year by January 30th of each year. The report must include the monthly emissions and total emissions attributed to CP-211 for each rolling 12-month period throughout the calendar year.

Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request.

The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved RACT evaluation. The first re-evaluation will be due no later than five years from the permit modification issuance date.

Parameter Monitored: VOC

Upper Permit Limit: 2.0 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 8: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025



sulfonic acid-based fume suppressants to any affected open surface hard chromium electroplating tank.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:40CFR 63.342(f), Subpart N

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator is subject to the following work practice standards:

(1) The owner/operator shall operate and maintain the affected source in a manner consistent with good air pollution control practices at all times (including during startups, shutdowns, and malfunctions). Malfunctions shall be corrected as soon as practicable. Operation and maintenance requirements established under section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

(2) The determination of whether the operation and maintenance procedures are acceptable will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source. Based on the results of this determination, the Administrator may require that the operation and maintenance plan be revised. Revisions may be required if it is found that the plan does not (a) address a malfunction that has occurred, (b) provide for the operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices, or (c) provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

(3) The owner/operator shall prepare an operation and



maintenance (O&M) plan to be implemented no later than the compliance date. The plan shall include the information found in 40CFR63.342(f)(3)(i) (A) through (E). If the O&M plan fails to address an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner/operator shall revise the O&M plan within 45 days to include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunctions, and a program for corrective actions taken for such events. If actions taken by the owner/operator during periods of malfunction are inconsistent with the O&M plan, the actions taken shall be recorded and reported by phone within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event. The owner/operator shall keep the written O&M plan on record to be available for inspection by the Administrator until the source is no longer subject to Subpart N. In addition, if the O&M plan is revised, previous versions shall be kept available for inspection for a period of 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 11: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:40CFR 63.343, Subpart N

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source that is subject to the standards in paragraphs §63.342(c) or (d) shall implement the housekeeping procedures specified in Table 2 of §63.342.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance deadline for small hard chromium electroplating



facilities that exceed the small facility threshold in the future

Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:40CFR 63.343(a)(5), Subpart N

Item 12.1:

This Condition applies to Emission Unit: U-00001

Item 12.2:

An owner or operator of an existing hard chromium electroplating tank or tanks located at a small, hard chromium electroplating facility that increases its maximum cumulative potential rectifier capacity, or its actual cumulative rectifier capacity, such that the facility becomes a large, hard chromium electroplating facility must comply with the requirements of section 63.342(c)(1)(i) for all hard chromium electroplating tanks at the facility no later than 1 year after the month in which monthly records required by sections 63.342(c)(2) and 63.346(b)(12) show that the large designation is met, or by the compliance date specified in paragraph (a)(1)(ii) of section 63.343, whichever is later.

Condition 13: Compliance Demonstration

Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:40CFR 63.343(c)(2), Subpart N

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The following monitoring requirements will demonstrate continuous compliance for the packed-bed scrubber system used to control emissions from the small hard chromium electroplating process.

The initial performance test must be completed within 180 days of permit issuance. A test protocol shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date at least 30 days prior to the test date. A test report shall be submitted to the RAPCE within 60 days of test completion.



During the initial performance test, Ingersoll Rand Engineered Centrifugal Compression (IRCO), complying with the emission limitations in §63.342 through the use of a packed-bed scrubber system shall determine the outlet chromium concentration using the procedures in §63.344(c), and shall establish as site-specific operating parameters the pressure drop across the system and the velocity pressure at the common inlet of the control device, setting the value that corresponds to compliance with the applicable emission limitation using the procedures in §63.344(d) (4) and (5). IRCO may conduct multiple performance tests to establish a range of compliant operating parameter values. Alternatively, IRCO may set as the compliant value the average pressure drop and inlet velocity pressure measured over the three test runs of one performance test, and accept ± 1 inch of water column from the pressure drop value and ± 10 percent from the velocity pressure value as the compliant range.

On and after the date on which the initial performance test is completed, IRCO shall monitor and record the velocity pressure at the inlet to the packed-bed system and the pressure drop across the scrubber system once each day that any affected source is operating. To be in compliance with the standards, the scrubber system shall be operated within ± 10 percent of the velocity pressure value established during the initial performance test, and within ± 1 inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant operating parameter values established during multiple performance tests.

Parameter Monitored: CHROMIUM

Upper Permit Limit: 0.015 milligrams per dry standard cubic meter

Reference Test Method: EPA Reference Method 306 or 306A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 14: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement: 40CFR 63.346(b), Subpart N

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001



Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source subject to the provisions of subpart N shall maintain the following records for such source:

- (1) Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of 40 CFR 63.342(f) and Table 1 of 40 CFR 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
- (2) Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment, except routine housekeeping practices;
- (3) Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment;
- (4) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.342(a)(1), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;
- (5) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR 63.342(f)(3);
- (6) Test reports documenting results of all performance tests;
- (7) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of 40 CFR 63.344(e);
- (8) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are



collected;

(9) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment;

(10) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment;

(11) The total process operating time of the affected source during the reporting period;

(12) Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at a facility expended during each month of the reporting period, and the total capacity expended to date for a reporting period, if the owner or operator is using the actual cumulative rectifier capacity to determine facility size in accordance with 40 CFR 63.342(c)(2);

(13) For sources using fume suppressants to comply with the standards, records of the date and time that fume suppressants are added to the electroplating or anodizing bath and records of the fume suppressant manufacturer and product name;

(14) For sources complying with 40 CFR 63.342(e), records of the bath components purchased, with the wetting agent clearly identified as a bath constituent contained in one of the components;

(15) Any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements, if the source has been granted a waiver under 40 CFR 63.10(f); and

(16) All documentation supporting the notifications and reports required by 40 CFR 63.9, 63.10, and 63.347.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Reporting Requirements
Effective between the dates of 12/22/2015 and 12/21/2025



Applicable Federal Requirement:40CFR 63.347(a), Subpart N

Item 15.1:

This Condition applies to Emission Unit: U-00001

Item 15.2:

The owner or operator of each affected source subject to 40CFR63 Subpart N shall fulfill all reporting requirements outlined in section 63.347 and in the General Provisions to 40 CFR part 63. General Provisions requirements are identified in Table 1 of Subpart N.

These reports shall be made to the Administrator at the appropriate address as identified in §63.13 or to the delegated State authority.

(1) Reports may be sent by U.S. mail, fax, or by another courier.

(i) Submittals sent by U.S. mail shall be postmarked on or before the specified date.

(ii) Submittals sent by other methods shall be received by the Administrator on or before the specified date.

(2) If acceptable to both the Administrator and the owner or operator of an affected source, reports may be submitted on electronic media.

**Condition 16: Notification of performance test
Effective between the dates of 12/22/2015 and 12/21/2025**

Applicable Federal Requirement:40CFR 63.347(d), Subpart N

Item 16.1:

This Condition applies to Emission Unit: U-00001

Item 16.2:

The owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin to allow the Administrator to have an observer present during the test. Observation of the performance test by the Administrator is optional.

In the event that the owner or operator is unable to conduct the performance test as scheduled, the owner or operator shall notify the Administrator within 5 days prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the owner or operator of legal responsibility for compliance with any other applicable provisions of Part 63 or with any other applicable Federal, State, or local requirement, nor will it prevent the Administrator from implementing or enforcing Part 63 or taking any other actions under the Clean Air Act.

**Condition 17: Required content for notification of compliance status
Effective between the dates of 12/22/2015 and 12/21/2025**

Applicable Federal Requirement:40CFR 63.347(e)(2), Subpart N

Item 17.1:

This Condition applies to Emission Unit: U-00001



Item 17.2:

The notification of compliance status shall be submitted to the New York State Department of Environmental Conservation Regional Office. A copy shall also be sent to the United States Environmental Protection Agency Region II office.

The notification shall list for each affected source:

- (i) The applicable emission limitation and the methods that were used to determine compliance with this limitation;
- (ii) If a performance test is required by Subpart N, the test report documenting the results of the performance test, which contains the elements required by §63.344(a), including measurements and calculations to support the special compliance provisions of §63.344(e) if these are being followed;
- (iii) The type and quantity of hazardous air pollutants emitted by the source reported in mg/dscm or mg/hr if the source is using the special provisions of §63.344(e) to comply with the standards. (If the owner or operator is subject to the construction and reconstruction provisions of §63.345 and had previously submitted emission estimates, the owner or operator shall state that this report corrects or verifies the previous estimate.) For sources not required to conduct a performance test in accordance with §63.343(b), the surface tension measurement may fulfill this requirement;
- (iv) For each monitored parameter for which a compliant value is to be established under §63.343(c), the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit;
- (v) The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirements, if methods differ from those identified in this subpart;
- (vi) A description of the air pollution control technique for each emission point;
- (vii) A statement that the owner or operator has completed and has on file the operation and maintenance plan as required by the work practice standards in §63.342(f);
- (viii) If the owner or operator is determining facility size based on actual cumulative rectifier capacity in accordance with §63.342(c)(2), records to support that the facility is small. For existing sources, records from any 12-month period preceding the compliance date shall be used or a description of how operations will change to meet a small designation shall be provided. For new sources, records of projected rectifier capacity for the first 12-month period of tank operation shall be used;
- (ix) A statement by the owner or operator of the affected source as to whether the source has complied with the provisions of this subpart.

Condition 18: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement: 40CFR 63.347(h), Subpart N

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 18.2:

Compliance Demonstration shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The requirements of 40 CFR 63.347(h) do not alleviate affected area sources from complying with the requirements of State or Federal operating permit programs under 40 CFR part 71.

The owner or operator of an affected source that is located at an area source site shall prepare a summary report to document the ongoing compliance status of the affected source. The report shall contain the information identified in 40 CFR 63.347(g)(3), shall be completed annually and retained on site, and made available to the Administrator upon request. The report shall be completed annually except as provided in 40 CFR 63.347(h)(2).

Monitoring Frequency: ANNUALLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 19: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement: 6 NYCRR 228-1.3 (a)

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Item 19.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

The permittee will conduct regular observations of visible emissions from the emission unit, process, etc. to which this condition applies while the source is in normal operating mode. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

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:



- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. 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 of these instances.

**** 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
Monitoring Frequency: WEEKLY
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 20.1:
The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00122/00020

Facility DEC ID: 9143000122



Emission Unit: U-00002

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement: 6 NYCRR 228-1.3 (c)

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Item 21.2:



Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 22: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (c)

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(1) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(3) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 23: Surface Coating - Handling, storage and disposal
Effective between the dates of 12/22/2015 and 12/21/2025**

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 23.1:

This Condition applies to Emission Unit: U-00002

Item 23.2:

Within the work area(s) associated with a coating line, the owner or operator of a facility must:

(1) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;



- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
 - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Condition 24: Surface Coating- application requirements
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (e)

Item 24.1:

This Condition applies to Emission Unit: U-00002

Item 24.2:

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;
- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;



(vii) airless spray, (including air assisted);

(viii) airbrush application methods for stenciling, lettering, and other identification markings; or

(ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

Condition 25: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable Federal Requirement:6 NYCRR 228-1.4 (b)

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility performing a Class B coating process shall not operate unless the strategies to control VOC emissions as defined in Subdivision 228-1.4(b) for the various types of Class B coating lines are used unless the appropriate emission control requirements of Section 228-1.5 of this Part have been met or a process specific RACT variance has been granted in accordance with Subdivision 228-1.5(e) of this Part. The VOC content limits for Class B coating lines can be met by averaging the VOC content of the materials used on a single surface coating unit each day ('i.e.', daily within- coating unit averaging).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 26: Contaminant List
Effective between the dates of 12/22/2015 and 12/21/2025



Applicable State Requirement:ECL 19-0301

Item 26.1:

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

CAS No: 007440-47-3
Name: CHROMIUM

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

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

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

**Condition 27: Malfunctions and start-up/shutdown activities
Effective between the dates of 12/22/2015 and 12/21/2025**

Applicable State Requirement:6 NYCRR 201-1.4

Item 27.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described



under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 28: Emission Unit Definition
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 28.1:

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

Emission Unit: U-00001

Emission Unit Description:

This emission unit consists of the hard chrome electroplating process. Emissions are controlled using a packed bed scrubber. The process is subject to National Emission Standards for Hazardous Air Pollutants 40CFR63 Subpart N.

Building(s): MAIN

Item 28.2:

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

Emission Unit: U-00002

Emission Unit Description:

This emission unit includes four paint booths. Primer and paint are applied using HVLP spray guns. Emissions are minimized by, when possible, the use of low VOC coatings and high transfer efficiency HVLP spray guns. Particulate emissions are controlled using panel filters.

Building(s): MAIN

Item 28.3:

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

Emission Unit: U-00003

Emission Unit Description:

This emission unit included the foam packing process that includes batch mixing of a polymeric polyisocyanate packaging material. The material is dispensed into packing crates to protect manufactured parts during shipment. Emissions from mixing and dispensing vent inside the building.

Building(s): MAIN

New York State Department of Environmental Conservation

Permit ID: 9-1430-00122/00020

Facility DEC ID: 9143000122



Item 28.4:

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

Emission Unit: U-00004

Emission Unit Description:

This emission unit consists of non-exempt machine tools, including one CNC boring machine and one CNC plasma cutter.

Building(s): MAIN

**Condition 29: Renewal deadlines for state facility permits
Effective between the dates of 12/22/2015 and 12/21/2025**

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 29.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Condition 30: Compliance Demonstration
Effective between the dates of 12/22/2015 and 12/21/2025**

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

Item 30.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 31: Visible Emissions Limited
Effective between the dates of 12/22/2015 and 12/21/2025**

Applicable State Requirement:6 NYCRR 211.2

Item 31.1:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00122/00020

Facility DEC ID: 9143000122



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.

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

Condition 32: Emission Point Definition By Emission Unit
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 32.1:

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

Emission Unit: U-00001

Emission Point: 00009

Height (ft.): 40

Diameter (in.): 6

NYTMN (km.): 4756.746

NYTME (km.): 192.973

Building: MAIN

Item 32.2:

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

Emission Unit: U-00002

Emission Point: 00003

Height (ft.): 40

Diameter (in.): 24

NYTMN (km.): 4756.746

NYTME (km.): 192.973

Building: MAIN

Emission Point: 00004

Height (ft.): 45

Diameter (in.): 84

NYTMN (km.): 4756.746

NYTME (km.): 192.973

Building: MAIN

Emission Point: 00005

Height (ft.): 44

Diameter (in.): 54

NYTMN (km.): 4756.746

NYTME (km.): 192.973

Building: MAIN

Emission Point: 00010

Height (ft.): 39

Diameter (in.): 48

NYTMN (km.): 4756.746

NYTME (km.): 192.973

Building: MAIN

Item 32.3:

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

Emission Unit: U-00004

Emission Point: 00011

Height (ft.): 40

Diameter (in.): 20

NYTMN (km.): 4756.746

NYTME (km.): 192.973

Building: MAIN



Emission Point: 00012
Height (ft.): 40 Diameter (in.): 40
NYTMN (km.): 4756.746 NYTME (km.): 192.973 Building: MAIN

Condition 33: Process Definition By Emission Unit
Effective between the dates of 12/22/2015 and 12/21/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 33.1:

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

Emission Unit: U-00001
Process: 100 Source Classification Code: 3-09-010-06
Process Description:
This process is hard chrome electroplating using a packed bed scrubber for emissions control.

Emission Source/Control: 0100C - Control
Control Type: SCRUBBER - PACKED BED

Emission Source/Control: 0100A - Process

Emission Source/Control: 0100B - Process

Item 33.2:

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

Emission Unit: U-00002
Process: 200 Source Classification Code: 3-09-020-99
Process Description:
This process is the application of primer end and topcoat to metal parts in any of the facility's four paint booths. Coatings are mixed, thinned, and applied using HVLP spray guns. Each booth is equipped with a panel filter. Spray guns are cleaned in immersion baths located adjacent to the booths. The baths are equipped with covers and kept closed when not in use.

Emission Source/Control: 0200B - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0200D - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0200F - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0200H - Control
Control Type: FABRIC FILTER



Emission Source/Control: 0200A - Process

Emission Source/Control: 0200C - Process

Emission Source/Control: 0200E - Process

Emission Source/Control: 0200G - Process

Item 33.3:

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

Emission Unit: U-00003

Process: 300

Source Classification Code: 3-09-001-98

Process Description:

This process is the preparation and application of polymeric isocyanate packing foam. Emissions occur inside the building.

Emission Source/Control: 0300A - Process

Item 33.4:

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

Emission Unit: U-00004

Process: 400

Source Classification Code: 3-09-030-04

Process Description:

This process is CNC machining of carbon and stainless steel using a CNC boring machine and a CNC plasma cutter.

Emission Source/Control: 0400B - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0400D - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 0400A - Process

Emission Source/Control: 0400C - Process

