



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1460-00032/00015
Effective Date: 04/21/2015 Expiration Date: 04/20/2025

Permit Issued To: L D MCCAULEY LLC
3875 CALIFORNIA RD
ORCHARD PARK, NY 14127

Contact: MARK E SANO
L D MCCAULEY
3875 CALIFORNIA ROAD
ORCHARD PARK, NY 14127
(716) 662-8980

Facility: L D MCCAULEY LLC
3875 CALIFORNIA RD
ORCHARD PARK, NY 14127

Contact: MARK E SANO
L D MCCAULEY
3875 CALIFORNIA ROAD
ORCHARD PARK, NY 14127
(716) 662-8980

Description:
L.D. McCauley, Inc. is a manufacturer of mechanical anti-theft devices. The manufacturing facility is located at 3875 California Road, Orchard Park, New York. The SIC code for this facility is 3499 - Fabricated Metal Products.

FACILITY DESCRIPTION:

L. D. McCauley manufactures specialty automotive locking lug nuts, and fasteners for security devices. The operations used in the manufacturing facility include milling, heat treatment, finishing (e.g., buffing and polishing), and electroplating. The manufacturing processes specified in the permit include the buffing and polishing, heat treatment, and plating. The milling process is an exempt activity. The manufacturing and control equipment associated with the permitted processes are identified in the permit. The equipment associated with the exempt activities are as follows:

1. Nineteen (19) milling machines;
2. Eleven (11) lathes;
3. Fifteen (15) multi spindle screw machines;
4. One (1) 5.3 MMBtu/hr combustion unit;
5. One (1) 2.4 MMBtu/hr combustion unit;
6. One (1) emergency generator;
7. Four (4) non-contact water cooling towers; and
8. Five (5) non-vapor phase cleaning equipment.



APPLICABLE REQUIREMENTS

1. 6NYCRR Part 212 - General Process Emissions:

Each permitted and exempt process at the facility is required to limit particulate emissions to less than 0.05 grains per dry standard cubic foot of exhaust gas. In addition, the average opacity from each process is limited to less than 20 percent opacity.

The nickel, chromium and hydrogen chloride emissions are controlled by a packed bed scrubber to reduce emissions of these hazardous air pollutants. In accordance with Table 2 of 6NYCRR Part 212, the control efficiency of the packed bed scrubber satisfies the specified control requirements.

2. 40CFR63 Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks:

The decorative chromium electroplating tanks use a wetting agent type fume suppressant as the method of compliance. The bath surface tension is required to be maintained below 40 dynes per centimeter. The work practice standards, monitoring, recordkeeping, and reporting requirements for the chromium electroplating process are specified in the permit.

In 2014, the facility added a manhole cover mold process called Fibershield. The first step to the Fibershield process is the "Glass Prep" process, where fiberglass and veil material are cut to the appropriate size and weighed in order to ensure that the correct amount of glass layers were cut. The second step is to load veil and glass layers into a mold, which is injected with resin. The mold is then heated until the cover solidifies. This is completed at one of five mold stations and emissions are vented to the atmosphere through two emission points. Once solidified, the cover is removed using a vacuum lift. At a grind booth, used molds are stripped to remove built up scum from the bottom of the mold and a pneumatic gun is used to blast the mold with media to remove remaining scum. The grind booth does not exhaust to the atmosphere, instead it exhausts filtered air back into the building. Then, at a spray booth, the mold is sprayed with mold release to ensure parts do not stick to the mold. The spray booth is exempt from permitting as per 6 NYCRR Part 228-1.1(b)(9) which states "facility wide use of up to 55 gallons of coatings (or up to 400 pounds of actual VOC usage) on a 12-month rolling total. This exemption is contingent on the owner or operator of the facility maintaining records of such surface coatings, and maintaining compliance with all requirements of section 228-1.3, 'General Requirements', of this Subpart." Next is quality assurance check. The first cover out of every mold is checked for thickness, and all covers are checked for visual defects and for voids and internal defects by an ultrasonic scan. Next, "blank" covers are placed in a vertical mill to reduce the size down to a custom diameter, which is then milled to add vent holes, lock holes, and nameplate slots. Emissions from the vertical mill and milling are controlled by a dust collector prior to being released to the atmosphere. Then, if the cover does not require a gasket, the edges are painted with resin to prevent wear. For covers requiring a gasket, the edges are hand-painted with black paint. This painting is exempt from permitting as per 6 NYCRR Part 228-1.1(b)(2) which states "coating lines where coatings are applied manually (by hand or without the use of mechanical means) with a brush, roller, cloth or an aerosol spray can." The gasket is created through a molding process by injecting resin into a gasket mold. The mold is cleaned by using a water based chemical to clean the scum out from the mold. The gasket station vents to the atmosphere. All gasket dimensions are then checked on the cover and visually inspected for defects, including bubbles and poor adhesion. The final process involves curing the covers in one of two electric ovens, with or without gaskets. Both of the ovens vent to the atmosphere through separate emission points. The finished covers are then sent to McGard for assembly.

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The emission sources associated with the Fibershield process include five closed mold stations, one gasket station, two electric curing ovens and one spray booth.

Wastewater treatment equipment will treat the wastewater generated during the plating operation. The wastewater generated during the plating process contains heavy metals. The treatment system will first neutralize the pH using sodium hydroxide and hydrochloric acid as necessary. Once the pH has been adjusted, a polymer is added that assists in coagulating and settling the metals. Lastly, the wastewater passes through sand filters and the effluent is then sent to a final holding tank before it is discharged. The solids collected during the treatment are stored in a holding tank and then dewatered further by a filter press. The water purged from the sludge after the filter is sent back through the treatment system. The emissions from the wastewater treatment system are from the pH neutralization tank, the sodium hydroxide storage tank and the hydrochloric acid storage tank. These sources are all vented to a scrubber before being released to the atmosphere.

At the facility, there is one (1) 100 Hp emergency generator that fires on natural gas and was manufactured in November of 2006. The engine is not subject to Subpart JJJJ because they it was manufactured prior to January 1, 2008. As such, the engine currently does not have to meet any NSPS or NESHAP engine rules. The EPA may address requirements for the engine through future rulemaking.

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

Item 3.2:

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

Item 3.3:

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



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

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

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ORCHARD PARK, NY 14127

Facility: L D MCCAULEY LLC
3875 CALIFORNIA RD
ORCHARD PARK, NY 14127

Authorized Activity By Standard Industrial Classification Code:
3499 - FABRICATED METAL PRODUCTS, NEC

Permit Effective Date: 04/21/2015

Permit Expiration Date: 04/20/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 211.1: Air pollution prohibited
- 2 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications
- 3 6 NYCRR 212.4 (c): Compliance Demonstration
- 4 6 NYCRR 212.6 (a): Compliance Demonstration
- 5 40CFR 63.11519(b), Subpart XXXXXX: Compliance Demonstration

Emission Unit Level

EU=1-PLANT

- 6 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 7 6 NYCRR 228-1.3 (b): Compliance Demonstration
- 8 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 9 6 NYCRR 228-1.3 (e): Compliance Demonstration

EU=1-PLANT,EP=09104,Proc=SCR

- 10 6 NYCRR 212.9 (b): Compliance Demonstration
- 11 6 NYCRR 212.11 (b) (5): Compliance Demonstration
- 12 6 NYCRR 212.11 (b) (5): Compliance Demonstration
- 13 6 NYCRR 212.11 (b) (5): Compliance Demonstration
- 14 40CFR 63.340(a), Subpart N: Compliance Demonstration
- 15 40CFR 63.340(b), Subpart N: Part 63 General Provisions requirements
- 16 40CFR 63.340(e), Subpart N: Compliance Demonstration
- 17 40CFR 63.342(a), Subpart N: Compliance timeframe
- 18 40CFR 63.342(b)(2), Subpart N: Compliance Demonstration
- 19 40CFR 63.342(d)(3), Subpart N: Compliance Demonstration
- 20 40CFR 63.342(f)(1), Subpart N: Applicability of work practice standards
- 21 40CFR 63.342(f)(2), Subpart N: Acceptable work practices
- 22 40CFR 63.346(c), Subpart N: Compliance Demonstration
- 23 40CFR 63.347(a), Subpart N: Reporting Requirements
- 24 40CFR 63.347(e)(1), Subpart N: Notification of compliance status
- 25 40CFR 63.347(h)(1), Subpart N: Compliance Demonstration
- 26 40CFR 63.347(h)(3)(iii), Subpart N: Compliance Demonstration

EU=1-PLANT,EP=09109,Proc=NEW

- 27 6 NYCRR 212.9 (b): Compliance Demonstration
- 28 6 NYCRR 212.11 (b) (5): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 29 ECL 19-0301: Contaminant List
- 30 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 31 6 NYCRR Subpart 201-5: Emission Unit Definition
- 32 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 33 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 34 6 NYCRR 211.2: Visible Emissions Limited

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- 35 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 36 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



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: 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 F: 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 G: 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 H: Proof of Eligibility for Sources Defined as Trivial

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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 I: 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 J: 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 K: 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 L: Federally Enforceable Requirements - 40 CFR 70.6 (b)

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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: Air pollution prohibited
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 1.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 2: Emissions from new emission sources and/or modifications
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 2.1:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 3: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 001310-73-2

SODIUM HYDROXIDE

CAS No: 007440-02-0

NICKEL METAL AND INSOLUBLE

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COMPOUNDS

CAS No: 007440-47-3 CHROMIUM
CAS No: 007440-66-6 ZINC
CAS No: 0NY075-00-0 PARTICULATES

Item 3.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates from any process source shall not exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4:

Compliance Demonstration

Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 40CFR 63.11519(b), Subpart XXXXXX

Item 5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(b)(1) Annual certification and compliance reports. The facility must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b)(2) through (7) of this section. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in paragraph (b)(3) of this section. Please send the annual certification and compliance report to the following addresses:

The address for the USEPA Region 2 is as follows:

Chief – Stationary Source Compliance Section
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 9 Headquarters
270 Michigan Avenue
Buffalo, NY 14203-2915

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

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).

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

Condition 6: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

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

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: CONTINUOUS

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 7: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

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

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(1) Except as provided for in paragraph (2) of this subdivision, the owner or operator of any emission source



subject to this Subpart must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department within 90 days of receiving the request. Any facility required to perform the overall removal efficiency calculation set forth in Equation 2 of section 228-1.5(c) of this Subpart, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 90 percent. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department. All records required by this paragraph must be maintained at the facility for a period of five years.

(2) Owners and operators of emission sources not subject to this Subpart as set forth in section 228-1.1(b)(9) or (13) of this Subpart, or those sources that are using coatings not subject to specific requirements of this Subpart as set forth in paragraph (e)(2) of this section, or section 228-1.4(b)(5)(iii)(e), (i) or (iv) of this Subpart, must maintain records on an as used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. If the exemption criteria are based on VOC usage, the records must contain calculations and supplier/manufacturer material data sheets for verification of VOC usage. All records required by this paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

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

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT

Item 8.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart 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

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solvent emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 9: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

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

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(2) A facility containing a coating line (other than a class A coating line) may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4 of this Subpart; provided such use is recorded in accordance with the requirements of paragraph 228-1.3(b)(2) of this section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:6 NYCRR 212.9 (b)

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT
Process: SCR

Emission Point: 09104

Regulated Contaminant(s):
CAS No: 007440-02-0 NICKEL METAL AND INSOLUBLE
COMPOUNDS
CAS No: 007647-01-0 HYDROGEN CHLORIDE
CAS No: 007440-47-3 CHROMIUM

Item 10.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

L.D. McCauley operates plating tanks using chromium, nickel, and zinc metals. The emissions from these plating operations are exhausted through a control device consisting of a packed bed scrubber. The pollutants generated from this process include heavy metals (chromium, nickel, zinc), sodium hydroxide, and hydrochloric acid.

L.D. McCauley elected to install and operate a packed bed scrubber to reduce emissions from this process. L.D. McCauley is required to operate and maintain the scrubber at all times during operation of the plating tanks. The scrubber shall be operated and maintained in accordance with manufacturer specifications and as specified in Preventative Maintenance Task #PL75 and PL76.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration

Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 6 NYCRR 212.11 (b) (5)

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT
Process: SCR

Emission Point: 09104

Regulated Contaminant(s):

CAS No: 007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS
CAS No: 007647-01-0	HYDROGEN CHLORIDE
CAS No: 007440-47-3	CHROMIUM

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The pressure differential across the packed scrubber medium shall be operated in the range between 0.0 to 1.0 inches of water. If the pressure is operating outside of this range, then the system and gauges shall be checked to determine the source of the problem. Appropriate corrective action shall be completed and documented as per

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Preventative Maintenance Task #PL75 and PL76.

Parameter Monitored: PRESSURE

Lower Permit Limit: 0 inches of water

Upper Permit Limit: 1.0 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED

RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance Demonstration

Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 6 NYCRR 212.11 (b) (5)

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT

Emission Point: 09104

Process: SCR

Regulated Contaminant(s):

CAS No: 007440-02-0

NICKEL METAL AND INSOLUBLE

COMPOUNDS

CAS No: 007647-01-0

HYDROGEN CHLORIDE

CAS No: 007440-47-3

CHROMIUM

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The pressure differential across the mist eliminator shall be operated in the range between 0.0 to 0.3 inches of water. If the pressure is operating outside of this range then the system and gauges shall be checked to determine the source of the problem. Appropriate corrective action shall be completed and documented as per the Preventative Maintenance Task #PL75 and PL76.

Parameter Monitored: PRESSURE

Lower Permit Limit: 0.0 inches of water

Upper Permit Limit: 0.3 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED

RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Compliance Demonstration

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Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:6 NYCRR 212.11 (b) (5)

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT
Process: SCR

Emission Point: 09104

Regulated Contaminant(s):
CAS No: 007440-47-3 CHROMIUM

Item 13.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The pressure reading for the spray manifold shall be operated below 18 pounds per square inch. If the pressure is operating above this value then the system and gauges shall be checked to determine the source of the problem. Appropriate corrective action shall be completed and documented as per the Preventative Maintenance Task #PL75 and PL76.

Parameter Monitored: PRESSURE

Upper Permit Limit: 18 pounds per square inch gauge

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration

Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:40CFR 63.340(a), Subpart N

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT
Process: SCR

Emission Point: 09104

Regulated Contaminant(s):
CAS No: 007440-47-3 CHROMIUM

Item 14.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The affected source to which the provisions of this part apply is each chromium electroplating or chromium anodizing tank at facilities performing hard chromium electroplating, decorative chromium electroplating, or chromium anodizing.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Part 63 General Provisions requirements
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:40CFR 63.340(b), Subpart N

Item 15.1:

This Condition applies to Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

Item 15.2:

Owners or operators of affected sources subject to 40CFR63 Subpart N must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Table 1 of Subpart N. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

Condition 16: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:40CFR 63.340(e), Subpart N

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

Regulated Contaminant(s):
CAS No: 007440-47-3 CHROMIUM

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Administrator has determined, pursuant to the criteria under section 502(a) of the Act, that an owner or operator of the following types of operations that are not

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by themselves major sources and that are not located at major sources, as defined under 40CFR70.2, is permanently exempt from title V permitting requirements for that operation:

- (i) Any decorative chromium electroplating operation or chromium anodizing operation that uses fume suppressants as an emission reduction technology; and
- (ii) Any decorative chromium electroplating operation that uses a trivalent chromium bath that incorporates a wetting agent as a bath ingredient.

L.D. McCauley operates a decorative chromium electroplating tank using fume suppressants as the emission control technology. L. D. McCauley is not a major source of emissions. As such, under current operating conditions, L.D. McCauley qualifies for the exemption and is permanently exempt from Title V permitting requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance timeframe
Effective between the dates of 04/21/2015 and 04/20/2025

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

Item 17.1:

This Condition applies to Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

Item 17.2:

Each owner or operator of an affected source subject to the provisions of 40CFR63 Subpart N shall comply with the requirements of Subpart N on and after the compliance dates specified in 40CFR63.343(a). All affected sources are regulated by applying maximum achievable control technology.

Condition 18: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:40CFR 63.342(b)(2), Subpart N

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

Regulated Contaminant(s):
CAS No: 007440-47-3 CHROMIUM

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Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If an owner or operator is controlling a group of tanks with a common add-on air pollution control device, the emission limitations of paragraphs (c), (d), and (e) of this section apply whenever any one affected source is operated. L.D. McCauley utilizes a packed bed scrubber to control emissions from a group of tanks used for chromium, nickel, and zinc plating. However, the add-on control device is not the method used to comply with this chromium standard. The chromium tanks are controlled by utilizing a chemical fume suppressant containing a wetting agent, as indicated in paragraph (d)(2). As such, this section does not apply under current operating conditions. L.D. McCauley will be required to comply with this section when the chemical fume suppressant is no longer used and the chromium emissions are controlled only by the packed bed scrubber.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 19: Compliance Demonstration

Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 40CFR 63.342(d)(3), Subpart N

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT
Process: SCR

Emission Point: 09104

Item 19.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

An owner or operator using a chemical fume suppressant containing a wetting agent must not allow the surface tension of the electroplating or anodizing bath contained within the affected tank to exceed 40 dynes/cm as measured by a stalagmometer at any time during tank operation. A compliance report shall be completed annually and retained on-site. This report shall be made available to the Administrator upon request.

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Parameter Monitored: SURFACE TENSION

Upper Permit Limit: 40 dynes per centimeter

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Applicability of work practice standards
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 40CFR 63.342(f)(1), Subpart N

Item 20.1:

This Condition applies to Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

Item 20.2:

The work practice standards of 40CFR63.342 address operation and maintenance practices. All owners or operators subject to the standards in section 63.342(c) and 63.342(d) are subject to these work practice standards.

At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by paragraph (f)(3) of section 63.342.

Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by paragraph (f)(3) of section 63.342.

Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emission limitations or other requirements in relevant standards.

Condition 21: Acceptable work practices
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 40CFR 63.342(f)(2), Subpart N

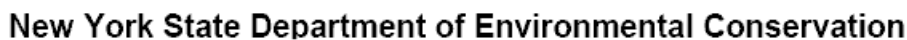
Item 21.1:

This Condition applies to Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

Item 21.2:

The work practice standards of Section 63.342 address operation and maintenance practices. All owners or operators subject to the standards in paragraph (c) and (d) of section 63.342 are subject to these work practices.

Determination of whether acceptable operation and maintenance procedures are being used



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Based on the results of a determination made under 63.342(f)(2)(i), the Administrator may require that an owner or operator of an affected source make changes to the operation and maintenance plan required by 63.342(f)(3) for that source. Revisions may be required if the Administrator finds that the plan:

- (A) Does not address a malfunction that has occurred;
- (B) Fails to provide for the operation of the affected source, the air pollution control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or
- (C) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as possible.

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

The Compliance Demonstration activity will be performed for:

Regulated Contaminant(s):
CAS No: 007440-47-3 CHROMIUM

Compliance Demonstration shall include the following monitoring:

Monitoring Description:

All records required by 40CFR63 Subpart N shall be maintained for a period of 5 years in accordance with section 63.10(b)(1).

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

This Condition applies to Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

The owner or operator of each affected source subject to 40CFR63 Subpart N shall fulfill all

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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 24: Notification of compliance status

Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:40CFR 63.347(e)(1), Subpart N

Item 24.1:

This Condition applies to Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

Item 24.2:

A notification of compliance status is required each time that an affected source becomes subject to the requirements of 40CFR 63 Subpart N.

Condition 25: Compliance Demonstration

Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement:40CFR 63.347(h)(1), Subpart N

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

Regulated Contaminant(s):
CAS No: 007440-47-3 CHROMIUM

Item 25.2:

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 located at an area source site shall prepare a summary report to document the ongoing compliance status of the affected source. The report shall be completed annually on a calendar year basis and retained on site except as

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provided in 40CFR63.347(h)(2). The reports shall be made available to the Administrator upon request. The report shall be completed annually except as provided in paragraph 40CFR63.347(h)(2).

The report must contain the following information:

- (1) The company name and address of the affected source;
- (2) An identification of the operating parameter that is monitored for compliance determination, as required by 40CFR63.343(c);
- (3) The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by paragraph (e) of section 63.347;
- (4) The beginning and ending dates of the reporting period;
- (5) A description of the type of process performed in the affected source;
- (6) The total operating time of the affected source during the reporting period;
- (7) A summary of operating parameter values, including the total duration of excess emissions expressed as a percent of the total source operating time during the reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- (8) A certification by a responsible official, as defined in 40CFR63.2, that the work practice standards in 40CFR63.342(f) were followed in accordance with the operation and maintenance plan for the source;
- (9) If the operation and maintenance plan required by 40CFR63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40CFR63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed;
- (10) A description of any changes in monitoring, processes, or controls since the last reporting period;
- (11) The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- (12) The date of the report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 26: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 40CFR 63.347(h)(3)(iii), Subpart N

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT Emission Point: 09104
Process: SCR

Regulated Contaminant(s):
CAS No: 007440-47-3 CHROMIUM

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As soon as the monitoring data required by 40CFR63.343(c) show that the source is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the owner shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the owner or operator may again request approval from the Administrator to reduce reporting frequency as allowed by paragraph (h)(3) of this section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 27: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT Emission Point: 09109
Process: NEW

Regulated Contaminant(s):
CAS No: 007440-47-3 CHROMIUM

Item 27.2:

Compliance Demonstration shall include the following monitoring:

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Facility DEC ID: 9146000032



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

L.D. McCauley operates plating tanks using chromium, nickel, and zinc metals. The emissions from these plating operations are exhausted through a control device consisting of a packed bed scrubber. The pollutants generated from this process include heavy metals (nickel and zinc), sodium hydroxide, and hydrochloric acid.

L.D. McCauley elected to install and operate a packed bed scrubber to reduce emissions from this process. L.D. McCauley is required to operate and maintain the scrubber at all times during operation of the plating tanks. The scrubber shall be operated and maintained in accordance with manufacturer specifications and as specified in Preventative Maintenance Task #PL107.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 28: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable Federal Requirement: 6 NYCRR 212.11 (b) (5)

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PLANT

Emission Point: 09109

Process: NEW

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 28.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The pressure differential across the packed scrubber medium shall be operated in the range between 0.0 to 2.0 inches of water. If the pressure is operating outside of this range, then the system and gauges shall be checked to determine the source of the problem. Appropriate corrective action shall be completed and documented as per Preventative Maintenance Task #PL107.

Parameter Monitored: PRESSURE

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Lower Permit Limit: 0.0 inches of water

Upper Permit Limit: 2.0 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

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: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;

(3) During the period of the emergency the facility owner 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 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 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 B: 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.

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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 C: 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 29: Contaminant List

Effective between the dates of 04/21/2015 and 04/20/2025

Applicable State Requirement:ECL 19-0301

Item 29.1:

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

CAS No: 001310-73-2

Name: SODIUM HYDROXIDE

CAS No: 007440-02-0

Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 007440-47-3

Name: CHROMIUM

CAS No: 007440-66-6

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Name: ZINC

CAS No: 007647-01-0

Name: HYDROGEN CHLORIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

Condition 30: Malfunctions and start-up/shutdown activities
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable State Requirement: 6 NYCRR 201-1.4

Item 30.1:

(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 31: Emission Unit Definition

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Effective between the dates of 04/21/2015 and 04/20/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 31.1:

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

Emission Unit: 1-PLANT

Emission Unit Description:

This emission unit comprises the entire facility. The processes include polishing (HAR), buffing (TOP), plating/packed scrubbers (SCR) and (NEW) and the Fibershield (FBS) manhole cover mold process.

**Condition 32: Renewal deadlines for state facility permits
Effective between the dates of 04/21/2015 and 04/20/2025**

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

Item 32.1:

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 33: Compliance Demonstration
Effective between the dates of 04/21/2015 and 04/20/2025**

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

Item 33.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 33.2:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 34: Visible Emissions Limited

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Effective between the dates of 04/21/2015 and 04/20/2025

Applicable State Requirement:6 NYCRR 211.2

Item 34.1:

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.

**** Emission Unit Level ****

Condition 35: Emission Point Definition By Emission Unit
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 35.1:

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

Emission Unit: 1-PLANT

Emission Point: 02701

Height (ft.): 30

Diameter (in.): 17

NYTMN (km.): 4743.4

NYTME (km.): 190.7

Emission Point: 02702

Height (ft.): 32

Diameter (in.): 16

NYTMN (km.): 4743.4

NYTME (km.): 190.7

Emission Point: 09104

Height (ft.): 32

Length (in.): 47

Width (in.): 62

NYTMN (km.): 4743.4

NYTME (km.): 190.7

Emission Point: 09109

Height (ft.): 39

Diameter (in.): 42

NYTMN (km.): 4743.4

NYTME (km.): 190.7

Emission Point: GASK1

Height (ft.): 20

Diameter (in.): 18

NYTMN (km.): 4743.4

NYTME (km.): 190.7

Emission Point: MOLD1

Removal Date: 12/16/2016

Height (ft.): 26

Length (in.): 36

Width (in.): 16

NYTMN (km.): 4743.4

NYTME (km.): 190.7

Emission Point: MOLD2

Removal Date: 12/16/2016

Height (ft.): 26

Length (in.): 36

Width (in.): 16

NYTMN (km.): 4743.4

NYTME (km.): 190.7

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Emission Point: OVEN1
Height (ft.): 20 Diameter (in.): 8
NYTMN (km.): 4743.4 NYTME (km.): 190.7

Emission Point: OVEN2 Removal Date: 12/16/2016
Height (ft.): 20 Diameter (in.): 4
NYTMN (km.): 4743.4 NYTME (km.): 190.7

Condition 36: Process Definition By Emission Unit
Effective between the dates of 04/21/2015 and 04/20/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 36.1:

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

Emission Unit: 1-PLANT
Process: FBS
Process Description:
Fibershield (FBS) manhole cover mold process. The FBS
emission sources include five (5) closed mold stations,
one (1) gasket station and two (2) curing ovens.

Emission Source/Control: GASK1 - Process

Emission Source/Control: MOLD1 - Process Removal Date: 12/16/2016

Emission Source/Control: MOLD2 - Process Removal Date: 12/16/2016

Emission Source/Control: MOLD3 - Process Removal Date: 12/16/2016

Emission Source/Control: MOLD4 - Process Removal Date: 12/16/2016

Emission Source/Control: MOLD5 - Process Removal Date: 12/16/2016

Emission Source/Control: OVEN1 - Process

Emission Source/Control: OVEN2 - Process Removal Date: 12/16/2016

Item 36.2:

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

Emission Unit: 1-PLANT
Process: HAR
Process Description:
Emissions from the process identified as HAR, include
particles from polishing and buffing of metal parts. The
particulate emissions are controlled by a fabric filter
identified as 02701 and exhausted through an emission
point identified as 02701. The buffing machine associated
with the process is identified as BUFF1.

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Emission Source/Control: 02701 - Control
Control Type: FABRIC FILTER

Emission Source/Control: BUFF1 - Process

Item 36.3:

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

Emission Unit: 1-PLANT

Process: NEW

Process Description:

Plating operations including zinc and nickel metals.

Emissions from these plating tanks are exhausted through a packed bed scrubber identified as 09109. The exhaust from the scrubber is vented through emission point 09109. The pollutants emitted from this process are heavy metals (zinc and nickel), sodium hydroxide and hydrochloric acid.

New wastewater treatment equipment will treat the wastewater generated during the plating operation.

Emission Source/Control: 09109 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: ZNCNI - Process

Item 36.4:

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

Emission Unit: 1-PLANT

Process: SCR

Process Description:

Plating operations including zinc, nickel, and chromium metals. Emissions from these plating tanks are exhausted through a packed bed scrubber identified as 09104. The exhaust from the scrubber is vented through emission point 09104. The pollutants emitted from this process are heavy metals (zinc, nickel, chromium), sodium hydroxide and hydrochloric acid. The process equipment associated with this process include two chromium electroplating tanks (CHROM, BLCHR), one chrome evaporator (EVAP1), surface tension fume suppressant used with three nickel tanks and two chromium electroplating tanks (SUPPR), three nickel tanks (NICK1, NICK2, NICK3), one zinc tank (ZINC1), one zinc/nickel tank which is 90% zinc/10% nickel alloy (ZNCNI), a zinc acid tank (ACID1), a nickel chromium acid tank (ACID2), a zinc cleaner tank (WASH1), and two nickel chromium cleaners (WASH2, WASH3).

Emission Source/Control: 09104 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: SUPPR - Control

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Control Type: CHEMICAL FUME SUPPRESSANT - WETTING
AGENT FOR REDUCING SURFACE TENSION

Emission Source/Control: ACID1 - Process

Emission Source/Control: ACID2 - Process

Emission Source/Control: BLCHR - Process

Emission Source/Control: CHROM - Process

Emission Source/Control: EVAP1 - Process

Emission Source/Control: NICK1 - Process

Emission Source/Control: NICK2 - Process

Emission Source/Control: NICK3 - Process

Emission Source/Control: WASH1 - Process

Emission Source/Control: WASH2 - Process

Emission Source/Control: WASH3 - Process

Emission Source/Control: ZINC1 - Process

Emission Source/Control: ZNCNI - Process

Item 36.5:

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

Emission Unit: 1-PLANT

Process: TOP

Process Description:

Emissions from the process identified as TOP, include particles from polishing and buffing of metal parts. The particulate emissions are controlled by a fabric filter identified as 02702. The exhaust from the fabric filter is vented through emission point 02702. The buffing processing equipment is identified as BUFF2.

Emission Source/Control: 02702 - Control

Control Type: FABRIC FILTER

Emission Source/Control: BUFF2 - Process