

New York State Department of Environmental Conservation
Facility DEC ID: 9290900052



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2909-00052/00045
Mod 0 Effective Date: 11/18/1999 Expiration Date: No expiration date.
Mod 2 Effective Date: 05/16/2006 Expiration Date: No expiration date.

Permit Issued To: METAL CLADDING INC
230 S NIAGARA ST
LOCKPORT, NY 14094-1927

Contact: JOHN A SHEPHERD
METAL CLADDING INC
230 SOUTH NIAGARA STREET
LOCKPORT, NY 14094
(716) 434-5513

Facility: METAL CLADDING INC
230 SOUTH NIAGARA
LOCKPORT, NY 14094

Contact: JOHN A SHEPHERD
METAL CLADDING INC
230 SOUTH NIAGARA STREET
LOCKPORT, NY 14094
(716) 434-5513

Description:

The purpose of this modification is to remove the condition describing the emission cap for Methyl Ethyl Ketone (MEK). MEK (CAS No. 78-93-3) which had been previously designated a hazardous air pollutant (HAP) has as of December 19, 2005, been removed from the list of HAPs contained in section 112 of the Clean Air Act (CAA) by the Environmental Protection Agency (EPA). Therefore, the condition limiting potential MEK emissions in excess of the 10 ton major source designation for HAPs no longer required.

MEK will be treated only as a volatile organic compound (VOC). There remains in effect a cap to limit volatile organic compounds (VOC) emissions to less than major source thresholds of 48 ton established through a RACT (Reasonably Available Control Technology) variance and incorporated into this permit

This permit will also re-state Metal Cladding as an area source for HAPs and therefore not subject to major source NESHAP requirements such as the NESHAP(National Emission Standard for Hazardous Air Pollutants) 40 CFR Part 63.3880 Subpart M for Surface Coating of Miscellaneous Metal Parts

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and Products promulgated in January 2004.

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: KENNETH C TAFT
 DIVISION OF ENVIRONMENTAL PERMITS
 182 EAST UNION - SUITE 3
 ALLEGANY, NY 14706-1328

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9
HEADQUARTERS



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

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

sonable 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 2-1: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 2-1.1:

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 2-1.2:

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 2-1.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, ted prior to actual



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transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Item 3.1:

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

Item 3.2:

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

Condition 2-2: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 2-2.1:

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

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

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

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

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



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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: METAL CLADDING INC
230 S NIAGARA ST
LOCKPORT, NY 14094-1927

Facility: METAL CLADDING INC
230 SOUTH NIAGARA
LOCKPORT, NY 14094

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

Mod 0 Permit Effective Date: 11/18/1999

Permit Expiration Date: No expiration date.

Mod 2 Permit Effective Date: 05/16/2006

Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

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- *2-4 6NYCRR 201-7: Capping Monitoring Condition
- *2-5 6NYCRR 201-7: Capping Monitoring Condition
- 2-7 6NYCRR 212.4(c): Compliance Demonstration
- 2-6 6NYCRR 212.6(a): Compliance Demonstration
- 2-8 6NYCRR 228.1(d): Will remain subject
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- 75 6NYCRR 201-5: Emission Unit Definition
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- 79 6NYCRR 201-5: Process Definition By Emission Unit

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- 80 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-PLATE

- 81 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

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 - 6NYCRR Part 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

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

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

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

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

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

Item E: Emergency Defense - 6NYCRR Part 201-1.5

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event



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occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific



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

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

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

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not

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

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

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

FEDERAL APPLICABLE REQUIREMENTS

The following conditions are federally enforceable.

Condition 2-1: Required Emissions Tests

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 2-1.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 2-2: Facility Permissible Emissions

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7

Item 2-2.1:

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



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

CAS No: 000108-88-3 (From Mod 2) PTE: 19,999 pounds per year
Name: TOLUENE

CAS No: 0NY100-00-0 (From Mod 2) PTE: 49,999 pounds per year
Name: HAP

CAS No: 0NY998-00-0 (From Mod 2) PTE: 96,000 pounds per year
Name: VOC

Condition 2-3: Capping Monitoring Condition

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7

Item 2-3.1:

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

6NYCRR 201-6.1(a)

Item 2-3.2:

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

Item 2-3.3:

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

Item 2-3.4:

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

Item 2-3.5:

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

Item 2-3.6:



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The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Facility-wide emissions of volatile organic compounds (VOC) are limited to less than 48 tons during each rolling twelve month period in order to establish the facility as a minor source for 6NYCRR, Part 201-6 Title V permitting requirements. Metal Cladding had accepted the 48 ton limit from all surface coating operations to establish a Reasonably Available Control Technology (RACT) variance for 6NYCRR, Part 228 in January 2000 and has chosen to accept this limit for all emission sources to establish the facility as a minor source of VOC.

Recordkeeping requirements established in the variance request require that the rolling twelve month total will be calculated for VOC at the end of each month based on the VOC content of the coatings and solvents used at the facility.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RAW MATERIAL

Parameter Monitored: VOC

Upper Permit Limit: 48 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-4: Capping Monitoring Condition

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7

Item 2-4.1:

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:

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6NYCRR 201-6.1(a)
40CFR 63-MMMM

Item 2-4.2:

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

Item 2-4.3:

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 2-4.4:

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 2-4.5:

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

Item 2-4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000108-88-3 TOLUENE

Item 2-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Facility-wide emissions of Toluene, a hazardous air pollutant (HAP) are limited to less than 10 tons per each rolling twelve month period in order to avoid the major source Title V permitting requirements of 6NYCRR, Part 201-6. Records are to be maintained in a readily accessible format which demonstrate that cumulative emissions of Toluene are less than the 10 ton limit during each rolling twelve month period. The rolling twelve



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month total will be calculated for Toluene at the end of each month based on the Toluene content of the coatings and solvents used at the facility. Annual reports will be submitted upon request of the Department.

By accepting this emission cap, the facility has established itself as a minor (area) source of HAPs and thus will not be subject to the NESHAP (National Emission Standards for Hazardous Air Pollutants) for major sources subject to 40 CFR 63.3880 Subpart M for Surface Coating of Miscellaneous Metal Parts and Products and any future NESHAP major source requirements.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RAW MATERIAL

Parameter Monitored: TOLUENE

Upper Permit Limit: 10 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-5: Capping Monitoring Condition

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7

Item 2-5.1:

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:

6NYCRR 201-6.1(a)

40CFR 63-MMMM

Item 2-5.2:

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

Item 2-5.3:

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 2-5.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an



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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 2-5.5:

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

Item 2-5.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 2-5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Facility-wide emissions of total hazardous air pollutants (HAPs) are limited to less than 25 tons per each rolling twelve month period in order to avoid the major source Title V permitting requirements of 6NYCRR, Part 201-6. Records are to be maintained in a readily accessible format which demonstrate that cumulative emissions of HAPs are less than the 25 ton limit during each rolling twelve month period. The rolling twelve month total will be calculated for HAPs at the end of each month based on the HAP content of the coatings and solvents used at the facility. Annual reports will be submitted upon request of the Department.

By accepting this emission cap, the facility has established itself as a minor (area) source of HAPs and thus will not be subject to the NESHAP (National Emission Standards for Hazardous Air Pollutants) for major sources subject to 40 CFR 63.3990 Subpart M for Surface Coating of Miscellaneous Metal Parts and Products and any future NESHAP major source requirements.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RAW MATERIAL

Parameter Monitored: HAP

Upper Permit Limit: 25 tons per year



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Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-7: Compliance Demonstration

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 2-7.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2-7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Particulate emissions from spray booth exhausts are limited to 0.05 gr/dscf. Disposable filters to capture solid particulates from overspray are to be replaced a minimum of once per day.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Monitoring Frequency: DAILY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-6: Compliance Demonstration

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 2-6.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2-6.2:

Compliance Demonstration shall include the following monitoring:



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

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 process emission source except for emissions 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 2-8: Will remain subject
Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.1(d)

Item 2-8.1:

Any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228 will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls below the thresholds set forth in 228.1(b).

Condition 2-9: Compliance Demonstration
Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.1(e)(13)

Item 2-9.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Low-use surface coatings used for intermittent or specialty-type operations, where the combined facility-wide total usage is 55 gallons or less on a twelve month rolling basis are not subject to the



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requirements of 6 NYCRR 228. Records of low-use surface coatings usage must be maintained on an as used basis in a format acceptable to the department in accordance with the recordkeeping provisions of section 228.5. Beginning January 1, 2005, mobile equipment repair and refinishing or color matched coating lines will not qualify for this exemption.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 23: Compliance Demonstration
Effective between the dates of 11/18/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(e)(1)

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Metal Cladding, as a major source of volatile organic compounds(VOC) is subject to the Reasonably Available Control Technology (RACT) requirements of 6NYCRR, Part 228.3 for miscellaneous metal parts coatings. These coatings are limited to a VOC content of 3.5 pounds per gallon less water and exempt solvent as applied for extreme performance coatings. Of the various coatings used at the facility, sixteen are non-compliant with five eligible for the low use exemption. The facility has submitted a RACT demonstration and variance request from the control requirements of this Part based on economic infeasibility. This department has reviewed and made an initial determination to approve the request. The RACT demonstration will be submitted to the United States Environmental Protection Agency(USEPA) for approval as a revision to the New York State Implementation Plan(SIP). The special conditions to establish RACT are incorporated into this permit as follows:



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1. Emissions of VOC from all surface coating operations are limited to 48 tons for any consecutive twelve month period.
2. Metal Cladding shall maintain records of the total VOC emissions for each rolling 12 month period which verify the facility is in compliance with the emission limit. Within five days of the close of the monthly inventory period, the facility must compute the total VOC emissions for the previous twelve month period.
3. Metal Cladding must continue to evaluate alternative control technologies, compliance strategies, and pursue sources of compliant coatings and/or coating reformulations and submit an annual report documenting this effort. This report is to be submitted to:

Regional Air Pollution Engineer
NYS Dept of Environmental Conservation
270 Michigan Avenue
Buffalo, N.Y. 14203
4. Records are to be kept on-site for a period of five years and made available to Department representatives on request.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2000.
Subsequent reports are due every 12 calendar month(s).

Condition 2-10: Compliance Demonstration

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 2-10.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 2-10.2:

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, 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. Any facility required to perform the overall removal efficiency calculation, 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 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-11: Compliance Demonstration

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(b)

Item 2-11.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner and operator of any emission source subject to 6NYCRR Part 228, must use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, respectively (see table 1, section 200.9 of Title 6), to measure the volatile content, water content, density, volume of solids, and



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weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-12: Prohibition of Sale

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.6(a)

Item 2-12.1:

(A) No person shall sell, specify, or require for use the application of a coating on a part or product at a facility with a coating line described in table 1 or 2 in section 228.7 or 228.8 of 6NYCRR Part 228 if such use is prohibited by any of the provisions of this Part. 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 this 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 tables 1 and 2 of sections 228.7 or 228.8 of 6NYCRR Part 228;

(2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in section 228.3(d) of 6NYCRR Part 228; and

(3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility per section 228.3(e) of 6NYCRR Part 228.

Condition 2-13: Compliance Demonstration

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Item 2-13.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 2-13.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Extreme performance coatings used for the surface coating of miscellaneous metal parts and products may contain a maximum of 3.5 pounds of volatile organic compounds (VOC) per gallon of coating (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: EXTREME PERFORMANCE COATING - MISCELLANEOUS METAL

PARTS

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: Method 24 (40 CFR 60) or Method 311 (40 CFR 63)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-14: Compliance Demonstration

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 2-14.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-14.2:

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 Part must:

(a) 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;

(b) store in closed, non-leaking containers spent or



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fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) 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;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
and

(f) minimize spills during the handling and transfer of coatings and VOC solvents.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 26: Compliance Demonstration
Effective between the dates of 11/18/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2.2

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of volatile organic compounds(VOC) from the sixteen sources specified in the NYSDEC Order on Consent 97-12 are limited to less than 40 tons for every rolling twelve month period to avoid the applicability of 6NYCRR,

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Part 231-2, New Source Review in Non-Attainment Areas. These sixteen sources consist of new sources and those relocated from the Tonawanda facility and are emission points 26, 27, 45, 46, 47, 48, 51, 52, 53, 54, 55, 56, 57, 59, 60, and 61. Monthly usage records of the VOC content of the coatings and solvents are to be used to demonstrate compliance with this emission limit and submitted to this department each calendar year.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2000.

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



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

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law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 2-15: Contaminant List

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 2-15.1:

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

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 0NY998-00-0

Name: VOC

Condition 2-16: Unavoidable noncompliance and violations

Effective between the dates of 05/16/2006 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 2-16.1:

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

- (a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the



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identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

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

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

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

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

Condition 74: General Provisions

Effective between the dates of 11/18/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 74.1:

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

Item 74.2:

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

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Item 74.3:

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

Condition 75: Emission Unit Definition

Effective between the dates of 11/18/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 75.1(From Mod 2):

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

Emission Unit: U-CLAD1

Emission Unit Description:

This emission unit consists of five emission points associated with the Cladding department. Three of the emission points vent manual spray-applied "Heresite" coating booths. Two vent batch-type coating ovens.

Building(s): 2

Item 75.2(From Mod 2):

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

Emission Unit: U-DSPIN

Emission Unit Description:

Dip and Spin Coating Processes. One of the emission points vents the dip/spin immersion coating booth and three vent parts curing ovens for the dip/spin process.

Building(s): 2

Item 75.3(From Mod 2):

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

Emission Unit: U-EGRSZ

Emission Unit Description:

This emission unit describes the EGR-2 and SZ painting lines. Emission point 00050 vents the SZ and EGR-2 spray & combined spray/flashoff booths and emission point 00049 vents the SZ curing oven.

Building(s): 2

Item 75.4(From Mod 2):

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



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Emission Unit: U-IRLAB

Emission Unit Description:

This emission unit describes the lab coating line.

Emission points (00045) vent the lab spray application booth and curing oven and cooling chamber (00046).

Building(s): 1

Item 75.5(From Mod 2):

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

Emission Unit: U-MOLD1

Emission Unit Description:

FRP Gel Coat Booth molding operation. The emission point vents a booth where closed molding, hand & spray lay-up of FRP components takes place.

Building(s): 2

Item 75.6(From Mod 2):

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

Emission Unit: U-NORD1

Emission Unit Description:

This emission unit consists of three emission points associated with the Nordson coating line. Two of the emission points vent automated spray application booths and one vents a parts curing oven.

Building(s): 2

Item 75.7(From Mod 2):

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

Emission Unit: U-PART1

Emission Unit Description:

This emission unit consists of four emission points associated with the exempt powder coating & exempt sand blasting operations. Two of the emission points vent powder coating application booths. Two of the emission points vent sand-blasting booths.

Building(s): 2

Item 75.8(From Mod 2):

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

Emission Unit: U-TKHY1

Emission Unit Description:

This emission unit consists of fourteen emission points (including three exempt) associated with the "TK" and



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hydromatic manual coating departments. Six of the emission points vent manual spray-applied coating booths. Eight of the emission points vent batch-type curing ovens.

Building(s): 1

Item 75.9(From Mod 0):

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

Emission Unit: U-PLATE

Emission Unit Description:

This emission unit consists of two emission points associated with the electroless nickel & phosphate lines. The emission points vent emissions from the various baths employed in each line.

Building(s): 1

Item 75.10(From Mod 0):

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

Emission Unit: U-ZCMZ1

Emission Unit Description:

This emission unit consists of four emission points associated with the "MZ" and "ZC" coating lines. Two of the emission points vent eletrostatic spray application booths. Two of the emission points vent parts curing ovens.

Building(s): 1

Condition 77: Air pollution prohibited

Effective between the dates of 11/18/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 77.1:

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 ******



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**Condition 78: Emission Point Definition By Emission Unit
Effective between the dates of 11/18/1999 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 201-5

Item 78.1(From Mod 2):

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

Emission Unit:	U-DSPIN		
Emission Point:	00047	Diameter (in.):	10
Height (ft.):	26		Building: 2
Emission Point:	00057	Diameter (in.):	8
Height (ft.):	23		Building: 2
Emission Point:	00058	Diameter (in.):	8
Height (ft.):	23		Building: 2
Emission Point:	00059	Diameter (in.):	24
Height (ft.):	25		Building: 2

Item 78.2(From Mod 2):

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

Emission Unit:	U-PART1		
Emission Point:	00056	Diameter (in.):	10
Height (ft.):	25		Building: 2

Item 78.3(From Mod 2):

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

Emission Unit:	U-TKHY1		
Emission Point:	00029	Diameter (in.):	19
Height (ft.):	29		Building: 1
Emission Point:	00031	Diameter (in.):	6
Height (ft.):	30		Building: 1



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Emission Point: 00032 Height (ft.): 31	Diameter (in.): 6	Building: 1
Emission Point: 00033 Height (ft.): 27	Diameter (in.): 18	Building: 1
Emission Point: 00035 Height (ft.): 31	Diameter (in.): 6	Building: 1
Emission Point: 00036 Height (ft.): 31	Diameter (in.): 6	Building: 1
Emission Point: 00037 Height (ft.): 29	Diameter (in.): 24	Building: 1
Emission Point: 00038 Height (ft.): 30	Diameter (in.): 18	Building: 1
Emission Point: 00039 Height (ft.): 24	Diameter (in.): 32	Building: 1
Emission Point: 00040 Height (ft.): 41	Diameter (in.): 10	Building: 1
Emission Point: 00042 Height (ft.): 22	Diameter (in.): 10	Building: 1

Item 78.4(From Mod 0):

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

Emission Unit: U-CLAD1		
Emission Point: 00053 Height (ft.): 22	Diameter (in.): 12	Building: 2
Emission Point: 00054		



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Height (ft.): 23	Diameter (in.): 36	Building: 2
Emission Point: 00055 Height (ft.): 23	Diameter (in.): 8	Building: 2
Emission Point: 00060 Height (ft.): 24	Diameter (in.): 24	Building: 2
Emission Point: 00066 Height (ft.): 24	Diameter (in.): 30	Building: 2

Item 78.5(From Mod 0):

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

Emission Unit: U-EGRSZ		
Emission Point: 00049 Height (ft.): 24	Diameter (in.): 8	Building: 2
Emission Point: 00050 Height (ft.): 26	Diameter (in.): 24	Building: 2

Item 78.6(From Mod 0):

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

Emission Unit: U-IRLAB		
Emission Point: 00045 Height (ft.): 30	Diameter (in.): 16	Building: 1
Emission Point: 00046 Height (ft.): 24	Diameter (in.): 18	Building: 1

Item 78.7(From Mod 0):

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

Emission Unit: U-MOLD1	
Emission Point: 00064	



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Height (ft.): 13

Diameter (in.): 30

Building: 2

Item 78.8(From Mod 0):

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

Emission Unit: U-NORD1

Emission Point: 00051

Height (ft.): 26

Diameter (in.): 10

Building: 2

Emission Point: 00052

Height (ft.): 25

Diameter (in.): 18

Building: 2

Emission Point: 00065

Height (ft.): 25

Diameter (in.): 18

Building: 2

Item 78.9(From Mod 0):

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

Emission Unit: U-PLATE

Emission Point: 00020

Height (ft.): 27

Diameter (in.): 38

Building: 1

Emission Point: 00021

Height (ft.): 20

Diameter (in.): 24

Building: 1

Item 78.10(From Mod 0):

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

Emission Unit: U-ZCMZ1

Emission Point: 00022

Height (ft.): 28

Diameter (in.): 16

Building: 1

Emission Point: 00023

Height (ft.): 29

Diameter (in.): 24

Building: 1

Emission Point: 00043



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Height (ft.): 26

Diameter (in.): 24

Building: 1

Emission Point: 00044

Height (ft.): 26

Diameter (in.): 18

Building: 1

**Condition 79: Process Definition By Emission Unit
Effective between the dates of 11/18/1999 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 201-5

Item 79.1(From Mod 2):

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

Emission Unit: U-CLAD1

Process: CLA

Source Classification Code: 4-02-025-01

Process Description:

This process entails the manual spray application of VOC based coatings on customer supplied parts. The parts are subsequently cured in ovens to "set" the coatings. The process results in emission of VOCs and HAPs that are present in the coatings and solvents. Emissions occur in both the spray booths and the curing ovens. This process employs phenolic-based coatings and MEK, MIBK and methyl alcohol as diluents/cleaners.

Emission Source/Control: 00054 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00060 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00066 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00053 - Process

Emission Source/Control: 00055 - Process

Item 79.2(From Mod 2):

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

Emission Unit: U-DSPIN

Process: DSP

Source Classification Code: 4-02-001-10

Process Description:

This process entails the mechanical application of VOC



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based coatings on customer supplied parts. The parts are subsequently cured in one of two ovens to "set" the coating. The process results in the emission of VOCs and HAPs that are present in the coatings and solvents. Emissions occur in both the dip/spin booth and the curing ovens. This process employs several coatings, depending on the parts being coated, and MEK as an additional diluent/cleaner.

Emission Source/Control: 00047 - Process

Emission Source/Control: 00057 - Process

Emission Source/Control: 00058 - Process

Emission Source/Control: 00059 - Process

Item 79.3(From Mod 2):

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

Emission Unit: U-EGRSZ

Process: EGR

Source Classification Code: 4-02-025-01

Process Description:

This process entails the automatic spray application of VOC-based coatings on customer supplied parts. The parts are subsequently cured in ovens to "set" the coating. The process results in the emission of VOCs and HAPs that are present in the solvent carrier. Emissions occur in both the spray booths and the curing ovens. This process uses one, dedicated coating & MEK as an additional diluent/cleaner. SZ portion has been removed, now represents EGR-2 line.

Emission Source/Control: 00050 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00049 - Process

Item 79.4(From Mod 2):

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

Emission Unit: U-IRLAB

Process: IRL

Source Classification Code: 4-02-025-01

Process Description:

This process entails the semi-automatic spray application of VOC based coatings on customer supplied parts. The parts are subsequently cured in ovens to "set" the



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coating. The process results in the emission of VOCs and HAPs that are present in the coatings and solvents. Emissions occur in both the spray booths and the curing ovens. This process employs several coatings, depending on the parts being coated & N-methyl-2-pyrrolidone as a clean-up solvent.

Emission Source/Control: 00045 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00046 - Process

Item 79.5(From Mod 2):

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

Emission Unit: U-MOLD1

Process: MOL

Source Classification Code: 3-08-007-22

Process Description:

The process entails the molding of fiberglass reinforced plastic (FRP) components using closed molding, manual lay-up and spray lay-up techniques. The process results in the emissions of VOCs and HAPs that are present in the raw materials (resins) employed.

Emission Source/Control: 00064 - Process

Item 79.6(From Mod 2):

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

Emission Unit: U-NORD1

Process: NOR

Source Classification Code: 4-02-025-01

Process Description:

This process entails the automatic spray application of VOC based coatings on customer supplied parts. The parts are subsequently cured in ovens to "set" the coatings. The process results in the emissions of VOCs and HAPs that are present in the coatings and solvents. Emissions occur in both the spray booths and the curing ovens. This process employs several coatings, depending on the parts being coated.

Emission Source/Control: 00052 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00065 - Control
Control Type: MAT OR PANEL FILTER



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Emission Source/Control: 00051 - Process

Item 79.7(From Mod 2):

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

Emission Unit: U-PART1

Process: PAR

Source Classification Code: 4-02-999-98

Process Description:

This process consists of particulate generating operations from powder coating application booth and two exempt sand blasting booths each of which vents to a baghouse . The process results in the emission of particulates that are generated as overspray from the powder coating application and airborne particles from the sand blasting operation. This is an exempt activity as per 6NYCRR, Part 201-3.2(c)(34).

Emission Source/Control: 00056 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: 0056A - Process

Item 79.8(From Mod 2):

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

Emission Unit: U-TKHY1

Process: TKH

Source Classification Code: 4-02-025-01

Process Description:

This process entails the manual spray application of VOC based coatings on customer supplied parts. The parts are subsequently cured in ovens to "set" the coating. The process results in the emission of VOCs and HAPs that are present in the coatings and solvents. Emissions occur in both the spray booths and the curing ovens. This process employs numerous coatings and involves coating of small batches of a wide variety of parts.

Emission Source/Control: 00029 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00033 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00037 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00038 - Control



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Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00039 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00031 - Process

Emission Source/Control: 00032 - Process

Emission Source/Control: 00035 - Process

Emission Source/Control: 00036 - Process

Emission Source/Control: 00040 - Process

Emission Source/Control: 00042 - Process

Item 79.9(From Mod 0):

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

Emission Unit: U-PLATE

Process: PLA

Process Description:

This process entails the use of an electroless nickel plating line to coat parts or a phosphate line to clean parts and/or provide rust inhibition. The process results in the emission of HAPs as a result of the use of hydrochloric acid as one of the cleaning/preparation steps in the process.

Emission Source/Control: 00020 - Process

Emission Source/Control: 00021 - Process

Item 79.10(From Mod 0):

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

Emission Unit: U-ZCMZ1

Process: ZCM

Process Description:

This process entails the semi automatic electrostatic spray application of VOC based coatings on customer supplied parts. The parts are subsequently cured in ovens to "set" the coating. The process results in the emission of VOCs and HAPs that are present in the coatings and solvents. Emissions occur in both the spray booths and the curing ovens. This process employes several coatings,

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depending on the parts being coated.

Emission Source/Control: 00023 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00043 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00022 - Process

Emission Source/Control: 00044 - Process

**Condition 80: Emissions from new emission sources and/or modifications
Effective between the dates of 11/18/1999 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 80.1:

This Condition applies to Emission Unit: U-MOLD1

Item 80.2:

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 81: Emissions from new emission sources and/or modifications
Effective between the dates of 11/18/1999 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 81.1:

This Condition applies to Emission Unit: U-PLATE

Item 81.2:

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.