



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-5620-00027/00153
Mod 0 Effective Date: 02/17/2000 Expiration Date: 02/17/2005
Mod 1 Effective Date: 06/07/2004 Expiration Date: 02/17/2005
SAPA Extended Begin Date: 02/18/2005
Mod 2 Effective Date: 04/12/2005 Expiration Date: 02/17/2005
SAPA Extended Begin Date: 02/18/2005

Permit Issued To: PRESTOLITE ELECTRIC INC
LEECE-NEVILLE HEAVY DUTY PRODUCTS DIVISION
400 MAIN STREET
ARCADE, NY 14009-1109

Contact: WILLIAM KOCH
PRESTOLITE ELECTRIC INC.
400 MAIN STREET
ARCADE, NY 14009
(716) 492-1700

Facility: PRESTOLITE ELECTRIC NY INC
400 MAIN STREET
ARCADE, NY 14009

Description:

Prestolite Electric, Inc. operates an electro-mechanical facility located in the Town of Arcade, Wyoming County, New York. Prestolite manufactures large and small frame alternators, large starter motors and electro-mechanical instruments. In addition, Prestolite manufactures programmable electronic speedometer and tachometer instruments for medium and heavy duty trucks, and for agricultural and industrial equipment.

Prestolite has proposed a major modification to the existing Air Title V operating permit as follows:

The modification involves the reassignment of 4.5 tons per year (tpy) volatile organic compound (VOC) emission reduction credits (ERCs) previously established by Prestolite for the permanent shut down of a vapor degreasing unit at Emission Unit P-00007/Emission Point 00600. The 4.5 tpy VOC ERCs will be reassigned by Prestolite to increase the maximum annual potential of Emission Unit P-00001 and to maintain the permanency of the prior 43.5 tpy VOC ERCs created from emission reductions in



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connection with Process SVP at Emission Unit P-00001. The approved reassignment of the 4.5 tpy of VOC ERCs results in a new VOC maximum annual potential for Emission Unit P-00001 of 28,800 pounds per any consecutive 12-month period.

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 ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions

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

Item 1-1.1:

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 1-1.2:

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 1-1.3:



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

Expired by Mod No: 1

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 1-2: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 1-2.1:

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

Expired by Mod No: 1

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

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materially changed since the permit was issued.

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

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

Item 5.1:

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



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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ARCADE, NY 14009-1109

Facility: PRESTOLITE ELECTRIC NY INC
400 MAIN STREET
ARCADE, NY 14009

Authorized Activity By Standard Industrial Classification Code:
3694 - ENGINE ELECTRICAL EQUIPMENT

Mod 0 Permit Effective Date: 02/17/2000

Permit Expiration Date: 02/17/2005

Mod 1 Permit Effective Date: 06/07/2004

Permit Expiration Date: 02/17/2005



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 24 6NYCRR 201-6: Emission Unit Definition
- 1-1 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 1-2 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 1-3 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 1-4 6NYCRR 201-6.5(e): Compliance Certification
- 27 6NYCRR 202-2.1: Compliance Certification
- 28 6NYCRR 202-2.5: Recordkeeping requirements
- 2-1 6NYCRR 212.4(c): Compliance Certification
- 1-5 6NYCRR 228.3(e): Compliance Certification
- 2-2 6NYCRR 228.7: Compliance Certification
- 2-3 6NYCRR 228.7: Compliance Certification
- 2-4 40CFR 68: Accidental release provisions.

Emission Unit Level

- 34 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 35 6NYCRR 201-6: Process Definition By Emission Unit

EU=P-00002,Proc=SCC

- 1-10 6NYCRR 228.1(e)(13): Compliance Certification
- 48 6NYCRR 228.4: Compliance Certification

EU=P-00003,Proc=SOL

- 50 6NYCRR 212.4(c): Compliance Certification
- 51 6NYCRR 212.6(a): Compliance Certification

EU=P-00004,Proc=DCP

- 1-11 6NYCRR 212.4(c): Compliance Certification
- 1-12 6NYCRR 212.6(a): Compliance Certification

EU=P-00005,Proc=FUR

- 54 6NYCRR 212.4(c): Compliance Certification
- 55 6NYCRR 212.6(a): Compliance Certification
- 56 6NYCRR 212.6(a): Compliance Certification

EU=P-00006,Proc=HCU

- 1-13 6NYCRR 212.4(c): Compliance Certification
- 1-14 6NYCRR 212.6(a): Compliance Certification

EU=P-00007

- 1-15 6NYCRR 231-2.6: Compliance Certification



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EU=P-00008,Proc=SCR

59 6NYCRR 212.4(b): Compliance Certification

EU=P-00009,Proc=SMT

1-16 6NYCRR 212.4(c): Compliance Certification

1-17 6NYCRR 212.6(a): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

1-18 ECL 19-0301: Contaminant List

1-19 6NYCRR 201-1.4: Unavoidable noncompliance and violations

2-5 6NYCRR 201-7: Facility Permissible Emissions

*2-6 6NYCRR 201-7: Capping Monitoring Condition

70 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

1-20 6NYCRR 201-7: Process Permissible Emissions

EU=P-00009,Proc=SMT

*1-21 6NYCRR 201-7: Capping Monitoring Condition

NOTE: * preceding the condition number indicates capping.

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Permit Expiration Date: 02/17/2005



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. 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

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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 - 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



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Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item F: Recycling and Salvage - 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: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

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

Item I: 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



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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: 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 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 K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V 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.

Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit

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renewal application.

Item N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

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

Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)

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

Item Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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

Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as

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may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

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

Item T: Severability - 6 NYCRR Part 201-6.5(a)(9)

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

Item U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

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

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive



or corrective measures adopted.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

Item W: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or

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contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item X: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits



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shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

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

Item Y: 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 Z: 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 AA: 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 BB: 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

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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 CC: 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 subject to annual compliance certification requirements for Title V permits only.

**Condition 24: Emission Unit Definition
Effective between the dates of 02/17/2000 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 201-6

Item 24.1(From Mod 2):

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

Emission Unit: P-00001

Emission Unit Description:

Emission Unit P-00001 includes a surface coating operation which uses coatings which comply with Part 228, Table 1 and, as such, contain less than 3.5 pounds per gallon of VOC as applied. The following process is included in this emission unit:

Process SVP (emission points 00326, 00333 and 00335) - This is a conveyORIZED varnish dip and oven dry process for stators and other electrical components. The facility received emission reduction credits for reducing VOC emissions by using reformulated coatings.

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Building(s): MAIN

Item 24.2(From Mod 2):

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

Emission Unit: P-00002

Emission Unit Description:

Emission Unit P-00002 includes surface coating operations regulated under 6NYCRR Part 228.7, Table 1 - Miscellaneous Metal Parts. The following processes are included in this emission unit:

Process RVP (emission points 00252, 00524 and 00525) - Rotors are roll dip varnished in a styrene monomer resin and then left in the process enclosures until dry. Several chemicals are added to the main varnish material as required.

Process SCC - Electrical components are coated in this process.

Building(s): MAIN

Item 24.3(From Mod 2):

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

Emission Unit: P-00008

Emission Unit Description:

Emission Unit P-00008 includes the surface coating of alternators and other electronic components using paints and solvents. The coatings within this emission unit contain chromate compounds. The coatings and solvents have VOC contents that are higher than allowed in Part 228. A RACT variance has been requested and is under review by the Environmental Protection Agency.

Building(s): MAIN

Item 24.4(From Mod 2):

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

Emission Unit: P-000N1

End Date: 12/01/2004

Emission Unit Description:

Emission Unit P-000N1 was created in the initial Air Title V operating permit as an operational flexibility condition. The intent of the emission unit was to allow the facility to replace the existing conveyORIZED varnishing unit with proposed smaller varnishing units and avoid a potential modification to the permit. Presolite



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has not installed any of the proposed new smaller varnishing units. As such, the Department is removing the proposed Emission Unit P-000N1 and the associated emission sources, processes and emission points from the permit to reflect actual conditions at the facility.

Building(s): MAIN

Item 24.5(From Mod 1):

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

Emission Unit: P-00003

Emission Unit Description:

Emission Unit P-00003 includes automated soldering operations for electrical components.

Building(s): MAIN

Item 24.6(From Mod 1):

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

Emission Unit: P-00004

Emission Unit Description:

Emission Unit P-00004 includes Process DCP and emission points 00156, 00157, 00158, 00170, 00173 and 00634. This is an aluminum die casting operation. Particulate emissions result from oil-based lubricants forming an oil fume.

Building(s): MAIN

Item 24.7(From Mod 1):

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

Emission Unit: P-00005

Emission Unit Description:

Emission Unit P-00005 includes the melting down of clean aluminum stock and scrap in two reverberatory, gas-fired furnaces.

Building(s): MAIN

Item 24.8(From Mod 1):

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

Emission Unit: P-00006

Emission Unit Description:

Emission Unit P-00006 includes Process HCU and emission points 00527 and 00635. This is a metal heat cleaning operation. Particulate emissions result from the removal of combustible materials from metal parts.

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Building(s): MAIN

Item 24.9(From Mod 1):

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

Emission Unit: P-00007

Emission Unit Description:

Emission Unit P-00007 is for a former conveyORIZED vapor degreasing operation utilizing trichloroethylene. The unit had a total surface area of 31.6 square feet. The degreasing operation generated 4.5 tons per year of VOC emissions for the last two years of operation. The unit was permanently removed from service on August 11, 1999.

Item 24.10(From Mod 1):

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

Emission Unit: P-00009

Emission Unit Description:

Emission Unit P-00009 includes Starter Motor Test Stands (SMT) and one emission point, #00633. Nine test stands are used to test starter motors manufactured at the facility. The test stands are located in the Main building.

**Condition 1-1: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 06/07/2004 and Permit Expiration Date**

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

Item 1-1.1:

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

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

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

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Condition 1-2: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 1-2.1:

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

Condition 1-3: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

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

Item 1-3.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-3.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the

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underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless

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otherwise limited by regulation. 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. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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

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

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2004.
Subsequent reports are due every 6 calendar month(s).

Condition 1-4: Compliance Certification
Effective between the dates of 06/07/2004 and Permit Expiration Date

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



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Replaces Condition(s) 25

Item 1-4.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-4.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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

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

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due on the same day each year

Condition 27: Compliance Certification
Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April



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15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 28: Recordkeeping requirements

Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 28.1:

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

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

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

Condition 2-1: Compliance Certification

Effective between the dates of 04/12/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 2-1.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: P-00002

Process: SCC

Emission Unit: P-00008

Process: SCR

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2-1.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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Emission Unit P-00002, Process SCC and Emission Unit P-00008, Process SCR which utilize compliant coatings must maintain particulate emissions below 0.05 grains per standard cubic foot of exhaust gas according to the following requirements.

- 1.) Each emission source in this emission unit shall have a gauge to measure pressure drop across the air filter.
- 2.) Each emission source shall be controlled by particulate air filter(s).
- 3.) The facility has gathered data to establish a normal pressure drop range through each air filter control system. The normal pressure drop range was determined as the difference between pressure drop when the filter is changed and a point prior to when the filter needs to be replaced. This evaluation was made with the first filter cycle in February, 2000.
- 4.) The pressure drop across the filter(s) shall be recorded weekly in a log. The log shall be kept on site for five years and made available to the Department's representative upon request during normal business hours.
- 5.) Any pressure drop outside the normal range shall prompt additional physical inspection and service as warranted to bring the air cleaner into the normal pressure drop range. Maintenance shall include replacement of the filter media if necessary.
- 6.) The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 0 inches of water

Upper Permit Limit: 3 inches of water

Monitoring Frequency: WEEKLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

Subsequent reports are due every 6 calendar month(s).

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Condition 1-5: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(e)

Item 1-5.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: P-00002

Process: SCC

Emission Unit: P-00008

Process: SCR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Certain surface coating operations at the facility use non-compliant coatings as specified in 6NYCRR Part 228. The facility has requested a variance from this requirement by submitting a process specific VOC RACT demonstration in January, 1996. The demonstration has been submitted to the EPA for approval and is currently pending. In accordance with the VOC RACT Plan, the facility has successfully reduced the amount of high-VOC coatings used at the facility and continues to further reduce the usage of non-compliant coatings at the facility.

Below are the requirements relative to the on-going VOC RACT demonstration. The requirements are applicable to Emission Unit P-00002, Process SCC which is the surface coating of miscellaneous metal parts for electrical components and Emission Unit P-00008, Process SCR which includes the surface coating of electrical components using chromate containing coatings.

1.) Prestolite shall submit an update to the VOC RACT Plan on a semi-annual basis to evaluate potential replacement coatings for each nonexempt, non compliant

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coating used at the facility and to update the usage data for solvents used in the as-applied coatings. The semi-annual report shall include the elements listed below:

a.) The name of each non-compliant coating used during the reporting period. The VOC content minus water and excluded solvents, the quantity consumed during the reporting period and the amount of VOC emitted during that period, the manufacturer name and address, the coating description, the product number and the MSDS sheet and the dates each candidate replacement coating was tested.

b.) The results of each candidate replacement coating test/evaluation as it compares with the performance specification assigned to the parts being coated by the non-exempt, non-compliant coating.

c.) The name of each non-exempt, non-compliant coating that has been replaced with a compliant coating during the reporting period.

d.) For each part which has a military specification which requires the use of non-exempt, non-compliant coating, the facility will request a letter from the military justifying the continued specification of the non-exempt, non-compliant coating on the specific part.

2.) All VOC records and corresponding calculations shall be kept on site for a minimum of five years. This information shall be made available to the Department's representative upon request during normal business hours.

3.) If the EPA does not concur with the RACT variance, Prestolite shall take immediate steps to address and resolve EPA concerns. In the event the concerns cannot be resolved, NYSDEC or EPA shall provide Prestolite written notice of its final decision and Prestolite shall prepare and submit a compliance plan and schedule within the time period specified in the notice.

4.) The facility is prohibited from installing any new process which will use non-compliant coatings without first submitting to the Department a permit application

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which includes a RACT analysis as required by Part 228.3(e) and receiving approval from the Department. Any proposed significant increase in VOC emissions from existing coating operations shall also require a revised RACT analysis and approval by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 2-2: Compliance Certification

Effective between the dates of 04/12/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Replaces Condition(s) 1-7

Item 2-2.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: P-00001

Process: SVP

Emission Unit: P-00002

Process: SCC

Emission Unit: P-00008

Process: SCR

Emission Unit: P-00002

Process: RVP

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-2.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Prestolite has developed a program to insure the VOC content of the as-applied compliant EXTREME PERFORMANCE COATINGS do not exceed the requirement of 6NYCRR Part

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228.7. The Emission Units and associated Processes subject to this condition are as follows:

Emission

Unit	Process	Description
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P-00001	SVP	Conveyorized varnish dip and oven process for stators and other electrical components
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P-00002	RVP	Rotors are roll dip varnished in styrene monomer resin
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P-00002	SCC	Surface coating of miscellaneous metal parts for electrical components
---------	-----	--

P-00008	SCR	Surface coating of metal parts with chromate and non-chromate coatings
---------	-----	--

Prestolite's program for periodic monitoring to assure the VOC content of EXTREME PERFORMANCE COATINGS used in these processes remains below the regulatory threshold consists of the following:

- 1.) 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 per gallon of coating (minus water and excluded VOC) as applied.
- 2.) Prestolite shall maintain coating manufacturer's MSDS sheets on the premises for all coatings used in these processes and they shall be made available to the Department upon request.
- 3.) Prestolite shall conduct a quality control program which verifies the VOC content of the coatings as applied. This program shall have the following elements:
 - a. If the extreme performance coatings are applied undiluted or are diluted with water prior to application, Prestolite shall obtain an annual report from the coating manufacturer that provides the VOC content of each coating they supply to Prestolite. The manufacturer shall use EPA Method 24 or other analytical methods acceptable to the Department to determine the VOC content of its coatings.
 - b. If the extreme performance coatings are diluted with a VOC-containing solvent prior to application, Prestolite shall record in a log the date and time of the addition and the amount of solvent added. For each coating used in these processes, Prestolite shall calculate the amount of

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solvent that would need to be added to bring the VOC content of the as-applied coating to 50% of the applicable VOC limit of 3.5 pounds of VOC per gallon (minus water and excluded solvent).

4.) Prestolite shall collect one random sample whenever the calculated VOC content of the coating as applied exceeds 50% of the applicable VOC limit of 3.5 pounds of VOC per gallon (less water and excluded solvent). The samples shall be analyzed according to EPA Method 24 or another analytical method acceptable to the Department to determine VOC content of the coating as applied. If any sample shows noncompliance, Prestolite shall submit a compliance plan to the Department for approval and implementation. The plan shall include a proposed stepped up monitoring program.

5.) The test results for each sample collected and the compliance status of this condition shall be reported to the Department semi-annually during each calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: EPA method 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 2-3: Compliance Certification

Effective between the dates of 04/12/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Replaces Condition(s) 1-6

Item 2-3.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: P-00008

Process: SCR

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Emission Unit: P-00002
Process: SCC

Emission Unit: P-00001
Process: SVP

Emission Unit: P-00002
Process: RVP

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

Item 2-3.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Prestolite has developed a program to insure the VOC content of the as-applied CLEAR COATINGS do not exceed the requirement of 6NYCRR Part 228.7. The Emission Units and associated Processes subject to this condition are as follows:

Emission

Unit Process Description

P-00001 SVP ConveyORIZED varnish dip and oven process for stators and other electrical components

P-00002 RVP Rotors are roll dip varnished in styrene monomer resin

P-00002 SCC Surface coating of miscellaneous metal parts for electrical components

P-00008 SRC Surface coating of metal parts with chromate and non-chromate coatings

Prestolite's program for periodic monitoring to assure the VOC content of CLEAR COATINGS used in these processes remains below the regulatory threshold consists of the following:

1.) CLEAR COATINGS used for the surface coating of miscellaneous metal parts and products may contain a maximum of 4.3 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) as applied.

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2.) Prestolite shall maintain varnish manufacturer's MSDS sheets on the premises for all clear coatings used in these processes and they shall be made available to the Department upon request.

3.) Prestolite shall conduct a quality control program which verifies the VOC content of the clear coatings as applied. This program shall have the following elements:

a. If the clear coatings are applied undiluted or are diluted with water prior to application, Prestolite shall obtain an annual report from the coating manufacturer that provides the VOC content of each coating they supply to Prestolite. The manufacturer shall use EPA Method 24 or other analytical methods acceptable to the Department to determine the VOC content of its coatings.

b. If the clear coatings are diluted with a VOC-containing solvent prior to application, Prestolite shall record in a log the date and time of the addition and the amount of solvent added. For each coating used in these processes, Prestolite shall calculate the amount of solvent that would need to be added to bring the VOC content of the as-applied coating to 50% of the applicable VOC limit of 4.3 pounds of VOC per gallon (minus water and excluded solvent).

4.) Prestolite shall collect one random sample whenever the calculated VOC content of the coating as applied exceeds 50% of the applicable VOC limit of 4.3 pounds of VOC per gallon (less water and excluded solvent). The samples shall be analyzed according to EPA Method 24 or another analytical method acceptable to the Department to determine VOC content of the coating as applied. If any sample shows noncompliance, Prestolite shall submit a compliance plan to the Department for approval and implementation. The plan shall include a proposed stepped up monitoring program.

5.) The test results for each sample collected and the compliance status of this condition shall be reported to the Department semi-annually during each calendar year.

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Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 4.3 pounds per gallon
Reference Test Method: EPA Method 24
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 2-4: Accidental release provisions.
Effective between the dates of 04/12/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 68

Replaces Condition(s) 1-9

Item 2-4.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

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

Condition 34: Emission Point Definition By Emission Unit



New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027

Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 34.1(From Mod 2):

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

Emission Unit: P-00001

Emission Point: 00326

Height (ft.): 36

Diameter (in.): 26

NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00333

Height (ft.): 36

Diameter (in.): 26

NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00335

Height (ft.): 36

Diameter (in.): 26

NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Item 34.2(From Mod 2):

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

Emission Unit: P-00002

Emission Point: 00252

Height (ft.): 49

Diameter (in.): 23

NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00260

Height (ft.): 49

Diameter (in.): 17

NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00265

Height (ft.): 49

Diameter (in.): 17

NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00392

Height (ft.): 31

Diameter (in.): 36

NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00401

Height (ft.): 49

Diameter (in.): 17

NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00511



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Height (ft.): 49	Diameter (in.): 17	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00516		
Height (ft.): 46	Diameter (in.): 18	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00520		
Height (ft.): 30	Diameter (in.): 18	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00523		
Height (ft.): 46	Diameter (in.): 18	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00524		
Height (ft.): 46	Diameter (in.): 14	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00525		
Height (ft.): 46	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00526		
Height (ft.): 46	Diameter (in.): 22	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00551		
Height (ft.): 49	Diameter (in.): 17	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00552		
Height (ft.): 49	Diameter (in.): 17	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00553		
Height (ft.): 49	Diameter (in.): 17	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00554		
Height (ft.): 49	Diameter (in.): 17	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00555		
Height (ft.): 49	Diameter (in.): 17	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN



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Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027

Emission Point: 00556
Height (ft.): 49 Diameter (in.): 17
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00557
Height (ft.): 49 Diameter (in.): 25
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00630
Height (ft.): 49 Diameter (in.): 17
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00631
Height (ft.): 49 Diameter (in.): 17
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00632
Height (ft.): 49 Diameter (in.): 17
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Item 34.3(From Mod 2):

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

Emission Unit: P-00008

Emission Point: 00515
Height (ft.): 46 Diameter (in.): 15
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00519
Height (ft.): 30 Diameter (in.): 30
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00522
Height (ft.): 46 Diameter (in.): 30
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Item 34.4(From Mod 2):

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

Emission Unit: P-000N1

Emission Point: 00610 Removal Date: 12/01/2004
Height (ft.): 49 Diameter (in.): 12
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00611 Removal Date: 12/01/2004



New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027

Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00612	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00613	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00614	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00615	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00616	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00617	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00618	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00620	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00621	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00622	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN
Emission Point: 00623	Removal Date: 12/01/2004	
Height (ft.): 49	Diameter (in.): 12	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN



New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027

Emission Point: 00624 Removal Date: 12/01/2004
Height (ft.): 49 Diameter (in.): 12
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00625 Removal Date: 12/01/2004
Height (ft.): 49 Diameter (in.): 12
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00626 Removal Date: 12/01/2004
Height (ft.): 49 Diameter (in.): 12
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00627 Removal Date: 12/01/2004
Height (ft.): 49 Diameter (in.): 12
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Item 34.5(From Mod 1):

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

Emission Unit: P-00001

Emission Point: 00254
Height (ft.): 46 Diameter (in.): 23
Building: MAIN

Item 34.6(From Mod 0):

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

Emission Unit: P-00003

Emission Point: 00019
Height (ft.): 29 Diameter (in.): 24
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00512
Height (ft.): 30 Length (in.): 11 Width (in.): 6
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Item 34.7(From Mod 1):

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

Emission Unit: P-00004

Emission Point: 00156
Height (ft.): 26 Length (in.): 30 Width (in.): 28
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN



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Emission Point: 00157			
Height (ft.): 27	Length (in.): 30	Width (in.): 28	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN	
Emission Point: 00158			
Height (ft.): 26	Length (in.): 28	Width (in.): 28	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN	
Emission Point: 00170			
Height (ft.): 26	Length (in.): 30	Width (in.): 28	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN	
Emission Point: 00173			
Height (ft.): 26	Length (in.): 28	Width (in.): 25	
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN	
Emission Point: 00634			
Height (ft.): 26	Length (in.): 30	Width (in.): 28	
		Building: MAIN	

Item 34.8(From Mod 0):

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

Emission Unit: P-00005			
Emission Point: 00510			
Height (ft.): 31	Diameter (in.): 31		
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN	
Emission Point: 00514			
Height (ft.): 37	Diameter (in.): 28		
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN	

Item 34.9(From Mod 1):

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

Emission Unit: P-00006			
Emission Point: 00527			
Height (ft.): 37	Diameter (in.): 12		
NYTMN (km.): 4714.52	NYTME (km.): 218.329	Building: MAIN	
Emission Point: 00635			
Height (ft.): 37	Diameter (in.): 12		
		Building: MAIN	

Item 34.10(From Mod 1):



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

Emission Unit: P-00009

Emission Point: 00633

Height (ft.): 46

Diameter (in.): 24

Building: MAIN

**Condition 35: Process Definition By Emission Unit
Effective between the dates of 02/17/2000 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 201-6

Item 35.1(From Mod 2):

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

Emission Unit: P-00001

Process: SVP

Source Classification Code: 4-02-003-01

Process Description:

Process SVP is a conveyORIZED varnish dip and oven dry process for stators and other electrical components. This process is regulated under 6 NYCRR Part 228 and the specific emission limits are provided in 6 NYCRR 228.7 Table 1 - Miscellaneous Metal Parts. The coating utilized in this process is applied without being diluted with VOC-containing solvents.

Emission Reduction Credits have been issued for this process. Total VOC emissions from this process can not exceed 28,800 lbs per year (i.e., combined VOC emissions from 00326, 00333 and 00335).

Emission Source/Control: I0326 - Process

Emission Source/Control: I0333 - Process

Emission Source/Control: I0335 - Process

Item 35.2(From Mod 2):

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

Emission Unit: P-00002

Process: RVP

Source Classification Code: 4-02-003-01

Process Description:

In Process RVP, rotors are roll dip varnished in a styrene monomer resin and then left in the process enclosures until dry. Several chemicals are added to the



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main varnish material as required to maintain varnish viscosity and performance characteristics. This process is regulated under 6 NYCRR Part 228 and the specific emission limits are provided in 6 NYCRR 228.7 Table 1 - Miscellaneous Metal Parts. This coating is applied without being diluted with VOC-containing solvents.

Emission Source/Control: I0252 - Process

Emission Source/Control: I0524 - Process

Emission Source/Control: I0525 - Process

Item 35.3(From Mod 2):

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

Emission Unit: P-00002

Process: SCC

Source Classification Code: 4-02-001-01

Process Description:

Process SCC includes the surface coating of miscellaneous metal parts for electrical components. This process is regulated under 6 NYCRR Part 228 and the specific emission limits are provided in 6 NYCRR 228.7 Table 1 - Miscellaneous Metal Parts. Due to various technical reasons, the coatings utilized in this process are unable to meet with VOC content limit. Consequently, Prestolite has submitted a RACT Evaluation Report under the provisions of 6 NYCRR Part 228.3(e). The RACT Evaluation Report has been accepted by the NYSDEC with the requirement that Prestolite comply with Special Permit Conditions for the sources at this process.

Prestolite operates paint booths and AMA stator varnish coating systems that use non-chromate coatings. The paint booths utilize particulate filters to control emissions of solids.

Emission Source/Control: I0260 - Process

Emission Source/Control: I0265 - Process

Emission Source/Control: I0392 - Process

Emission Source/Control: I0401 - Process

Emission Source/Control: I0511 - Process

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Emission Source/Control: I0516 - Process

Emission Source/Control: I0520 - Process

Emission Source/Control: I0523 - Process

Emission Source/Control: I0526 - Process

Emission Source/Control: I0551 - Process

Emission Source/Control: I0552 - Process

Emission Source/Control: I0553 - Process

Emission Source/Control: I0554 - Process

Item 35.4(From Mod 2):

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

Emission Unit: P-00008

Process: SCR

Source Classification Code: 4-02-001-01

Process Description:

Process SCR includes the surface coating of miscellaneous metal parts (electrical components) with chromate and non-chromate containing coatings. This process is regulated under 6 NYCRR Part 228 and the specific emission limits are provided in 6 NYCRR 228.7 Table 1 - Miscellaneous Metal Parts. This rule establishes limit of 3.5 lbs of VOC per gallon of coating as applied. Due to various technical reasons, the coatings utilized in this process are unable to meet with VOC content limit. Consequently, Prestolite has submitted a RACT Evaluation Report under the provisions of 6 NYCRR Part 228.3(e). The RACT Evaluation Report has been accepted by the NYSDEC with the requirement that Prestolite comply with Special Permit Conditions for the sources at this process.

Since the majority of the coatings used in this process are chromate-containing, particulate emissions are controlled through high-efficiency air filters with a manufacturer's rated efficiency of 99.71% for particulates > 1 micron in diameter.

Emission Source/Control: K0515 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

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Emission Source/Control: K0519 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: K0522 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: I0515 - Process

Emission Source/Control: I0519 - Process

Emission Source/Control: I0522 - Process

Item 35.5(From Mod 2):

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

Emission Unit: P-000N1

Process: NRV

Source Classification Code: 4-02-003-01

Process End Date: 12/1/2004

Process Description:

Process NRV was proposed in the initial Title V operating permit as a new process for varnishing rotors and other electronic components. Process NRV was intended to replace Process RVP. The proposed Process NRV was never installed, thus, the Department is removing it from the permit to reflect actual facility conditions.

Emission Source/Control: I0610 - Process

Emission Source/Control: I0611 - Process

Emission Source/Control: I0612 - Process

Emission Source/Control: I0613 - Process

Emission Source/Control: I0614 - Process

Emission Source/Control: I0615 - Process

Emission Source/Control: I0616 - Process

Emission Source/Control: I0617 - Process

Emission Source/Control: I0618 - Process

Item 35.6(From Mod 2):

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

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Emission Unit: P-000N1

Process: NSV

Source Classification Code: 4-02-003-01

Process End Date: 12/1/2004

Process Description:

Process NSV was proposed in the initial Title V operating permit as a new process for varnishing stators and other electronic components. Process NSV was intended to replace Process SVP. The proposed Process NSV was never installed, thus, the Department is removing it from the permit to reflect actual facility conditions.

Emission Source/Control: I0620 - Process

Emission Source/Control: I0621 - Process

Emission Source/Control: I0622 - Process

Emission Source/Control: I0623 - Process

Emission Source/Control: I0624 - Process

Emission Source/Control: I0625 - Process

Emission Source/Control: I0626 - Process

Emission Source/Control: I0627 - Process

Item 35.7(From Mod 1):

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

Emission Unit: P-00003

Process: SOL

Source Classification Code: 3-13-035-01

Process Description:

Process SOL performs automated soldering operations for electrical components. This process is regulated under 6 NYCRR Part 212 that sets a limit on air emissions from general processes.

Emission Source/Control: REFLO - Process

Emission Source/Control: WAVE1 - Process

Item 35.8(From Mod 1):

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

Emission Unit: P-00004



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Facility DEC ID: 9562000027

Process: DCP

Source Classification Code: 3-04-001-14

Process Description:

Process DCP includes six (6) die casting machines identified as CAST2, CAST4, CAST5, CAST6, CAST7, and CAST8. There is one 400-ton, one 600-ton, and four 800-ton die casting machines. In this process, molten aluminum is poured into steel molds that are compressed to form alternator housings. The steel molds are coated with a water borne lubricant that is 20-30% organic content. The lubricant prevents the molten aluminum from adhering to the steel molds. It has been conservatively assumed 100% of the organic-based components within the lubricant will form an oil fume that will be emitted into the air.

This process is regulated under 6 NYCRR Part 212. In 6 NYCRR 212.4(c), a limit on particulate air emissions from general processes is limited to a grain-loading standard (0.05 gr/dscf).

Emission Source/Control: CAST1 - Process

Emission Source/Control: CAST2 - Process
Design Capacity: 400 tons

Emission Source/Control: CAST3 - Process

Emission Source/Control: CAST4 - Process
Design Capacity: 800 tons

Emission Source/Control: CAST5 - Process
Design Capacity: 800 tons

Emission Source/Control: CAST6 - Process
Design Capacity: 600 tons

Emission Source/Control: CAST7 - Process
Design Capacity: 800 tons

Emission Source/Control: CAST8 - Process
Design Capacity: 800 tons

Item 35.9(From Mod 1):

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

Emission Unit: P-00005

Process: FUR

Source Classification Code: 3-04-001-14



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Facility DEC ID: 9562000027

Process Description:

Process FUR melts down clean aluminum stock and scrap in two reverberatory, gas-fired furnaces. The maximum amount of aluminum that the furnaces can melt is a combined total of 250 tons per month. The potential to emit (PTE) and the emission rate potential (ERP) for this process will be based on this aluminum production level. The emissions from these furnaces are uncontrolled. During the normal melting operations, only non-HAP particulates will be emitted. For approximately one hour each day, a maximum of 15 pounds of a solid flux material is added to remove contaminants from the melt. These furnaces will emit particulates, hydrogen chloride and hydrogen fluoride during these fluxing operations. The process is regulated under 6 NYCRR Part 212. This rule establishes a limit on air emissions from general processes.

Emission Source/Control: SHAEF - Process

Emission Source/Control: WARWI - Process

Item 35.10(From Mod 1):

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

Emission Unit: P-00006

Process: HCU

Source Classification Code: 4-02-025-02

Process Description:

Process HCU includes two (2) heat cleaning ovens identified as HEATC and HEATD. The process contaminants are controlled by afterburners identified as KEATC and KEATD. This process removes paint, grease, oils, varnish, epoxy, rubber and other combustible materials from metal parts. The parts are heated to 750F in an oxygen deficient atmosphere to enhance hydrocarbon decomposition. A 1500F afterburner is designed to provide excess air for complete combustion.

This process is regulated under 6 NYCRR Part 212. In 6 NYCRR 212.4(c), a limit on particulate air emissions from general processes is limited to a grain-loading standard (0.05 gr/dscf).

Emission Source/Control: KEATC - Control
Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: KEATD - Control
Control Type: DIRECT FLAME AFTERBURNER



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Emission Source/Control: HEATC - Process

Emission Source/Control: HEATD - Process

Item 35.11(From Mod 1):

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

Emission Unit: P-00007

Process: HSC

Source Classification Code: 4-01-002-25

Process Description:

Emission Unit P-00007 is for a former conveyORIZED vapor degreasing operation utilizing trichloroethylene. The unit had a total surface area of 31.6 square feet. The degreasing operation generated 4.5 tons per year of VOC emissions for the last two years of operation. The unit was permanently removed from service on August 11, 1999.

Emission Source/Control: 00HSC - Process Removal Date: 08/11/1999

Item 35.12(From Mod 1):

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

Emission Unit: P-00009

Process: SMT

Source Classification Code: 2-04-004-02

Process Description:

Emission Unit P-00009 includes Starter Motor Test Stands (SMT) and one emission point, #00633. Nine test stands are used to test starter motors manufactured at the facility. The test stands are located in the Main building. The diesel engines range in horsepower (hp) from 250 hp to <400 hp (399 hp maximum). In this process, a starter motor or motors are connected to the approximately sized diesel engines. The test cycle consists of starting the engine, operating the engine for five seconds to evaluate starter motor performance, and then shutting the engine down. The shut down procedure takes approximately 25 seconds. Each starter completes two cycles per minute continuously until the starter completes the required number of starting cycles.

The emissions from the engine test stands are uncontrolled. Exhaust from each of the nine engines are collected and emitted through one common stack. The NO_x emissions from the starter motor test stands will increase facility PTE emissions by 41.4 tons per year.



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Facility DEC ID: 9562000027

Emission Source/Control: 0SMT1 - Process

Emission Source/Control: 0SMT2 - Process

Emission Source/Control: 0SMT3 - Process

Emission Source/Control: 0SMT4 - Process

Emission Source/Control: 0SMT5 - Process

Emission Source/Control: 0SMT6 - Process

Emission Source/Control: 0SMT7 - Process

Emission Source/Control: 0SMT8 - Process

Emission Source/Control: 0SMT9 - Process

Condition 1-10: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

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

Item 1-10.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00002

Process: SCC

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-10.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Process SCC is the surface coating of miscellaneous metal parts for electrical components and includes emission points 00260, 00265, 00392, 00401, 00511, 00516, 00520, 00523, 00526, 00551-00557, and new emission points 00630, 00631 and 00632. The following surface coatings used within this process are exempt from Part 228 requirements under the provisions of 6NYCRR Part 228.1(e)(13):



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Prestolite Part Number, Coating Name, Coating
Manufacturer

P075097651, Styrene Epoxy Varnish, Ranbar

The facility shall comply with the following terms to
maintain their eligibility for exemption:

- 1.) Records shall be maintained on an as-used basis in a
format acceptable to the Department and document combined
facility wide total usage 55 gallons or less on a twelve
month rolling basis,
- 2.) The compliance status of this condition shall be
reported to the Department semi-annually during each
calendar year.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: COATING
Upper Permit Limit: 55 gallons
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2004.
Subsequent reports are due every 6 calendar month(s).

Condition 48: Compliance Certification
Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00002
Process: SCC

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 48.2:

Compliance Certification shall include the following monitoring:

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

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Monitoring Description:

- 1.) Process SCC is the surface coating of miscellaneous metal parts for electrical components and includes emission points 00260, 00265, 00392, 00401, 00511, 00516, 00520, 00523, 00526, 00551-00557, and new emission points 00630, 00631 and 00632.
- 2.) Pressure drop falling outside the normal operating range (see monitoring condition for Part 212.4(c)) shall require the facility to visually inspect the spray booth filter. Corrective action shall be taken whenever emission breakthrough is observed. Any corrective action shall be logged. Records shall be kept on site for a period of up to 5 years. Logs shall be made available to the Department during normal business hours upon request.
- 3.) Under no circumstance shall the 6 minute average opacity taken according to EPA Method 9 exceed 20%. Method 9 opacity observations shall be made upon Department request.
- 4.) The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PRESSURE CHANGE
Monitoring Frequency: WEEKLY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2000.
Subsequent reports are due every 6 calendar month(s).

Condition 50: Compliance Certification
Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00003
Process: SOL

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



CAS No: 0NY075-00-0 PARTICULATES

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

1.) Process SOL includes EP 00019 and EP 00512 and is an automated soldering operation for electrical components. Material balance calculations are used to calculate the actual particulate emission rate from this emission unit.

2.) The maximum emission of particulate from this process is calculated at 0.0009 grains per scf based on the use of 600 pounds of solder per month. The calculated emission rate is substantially below the regulatory limit of 0.05 grains per scf. Therefore, periodic monitoring shall consist of the facility monitoring solder usage and notifying the Department when (if) the solder increases above 600 pounds per month. At that point actual emissions will be reevaluated and additional testing may be requested by the Department.

3.) The facility shall maintain a monthly log of solder usage based on purchase records of the bar solder used in this process. The report shall estimate monthly usage based on purchases. This log shall be kept on site for five years and made available to the Department's representative upon request during normal business hours.

4.) The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: SOLDER

Upper Permit Limit: 600 pounds per month

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2000.

Subsequent reports are due every 6 calendar month(s).



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Condition 51: Compliance Certification

Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00003

Process: SOL

Item 51.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- 1.) Process SOL includes EP 00019 and EP 00512 and is an automated soldering operation for electrical components. The facility shall establish a baseline opacity for each emission point in this emission unit under maximum expected production (solder usage) using EPA Method 9. This test shall be conducted within 60 days of the this title V permit being issued. The results and production rate shall be kept on site for five years. In the event an exceedance is recorded, the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and schedule for compliance.
- 2.) The facility shall conduct an EPA method 9 opacity observation and record results whenever production exceeds the rate during the baseline opacity test. The new opacity and production level will form a new baseline. The results and production rate shall be kept on site for five years. In the event an exceedance is recorded, the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and schedule for compliance.
- 3.) The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2000.

Subsequent reports are due every 6 calendar month(s).

Condition 1-11: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Replaces Condition(s) 52

Item 1-11.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00004

Process: DCP

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-11.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

- 1.) Process DCP includes an aluminum die casting operation. Particulate emissions result from oil-based lubricants forming an oil fume. Material balance calculations are used calculate the actual particulate emission rate from this process.
- 2.) The maximum emission of particulate from this process is calculated at 0.0035 grains per scf based on the use of 2000 gallons of lubricant per year. The calculated emission rate is substantially below the regulatory limit of 0.05 grains per scf. Therefore, periodic monitoring shall consist of the facility monitoring lubricant usage and notifying the Department when (if) the lubricant use increases above 2000 gallons per year. At that point, actual emissions will be reevaluated and additional testing may be requested by the Department.
- 3.) The facility shall maintain a monthly log of



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lubricant usage based on purchase records of the lubricant used in this process. This log shall be kept on site for five years and made available to the Department's representative upon request during normal business hours.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: LUBE OIL

Upper Permit Limit: 2000 gallons per year

Monitoring Frequency: MONTHLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 1-12: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Replaces Condition(s) 53

Item 1-12.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00004

Process: DCP

Item 1-12.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- 1.) Process DCP includes an aluminum die casting operation. Particulate emissions result from oil-based lubricants forming an oil fume.
- 2.) The facility shall conduct an EPA method 9 opacity observation and record results whenever production exceeds the rate established during the baseline opacity test. The new opacity and production level will form a new baseline. The results and production rate shall be kept on site for five years. In the event an exceedance is recorded, the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and schedule for compliance.

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3.) The compliance status of this condition shall be reported to the Department semi-annually during each calendar year.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 54: Compliance Certification

Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00005

Process: FUR

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

1.) Process FUR includes EP 00510 and EP 00514. This process melts down clean aluminum stock and scrap generated from on site aluminum casting operations in two reverberatory furnaces. Based on the current and anticipated future die casting capacity of the facility, the maximum amount of aluminum that the furnace will be required to melt is 250 tons of aluminum, per week. Approximately 18 pounds of solid flux is added daily to remove contaminants from the melt. Emissions from these furnaces are uncontrolled.

2.) These furnaces emit particulate, hydrogen chloride

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and hydrogen fluoride. An Air Guide 1 screen was run on hydrogen chloride and hydrogen fluoride using a mass balance approach to estimate emissions. The impacts were substantially below Air Guide 1 screening levels. Particulate emission rates, especially during fluxing, are uncertain. Therefore, stack testing of emission point 00510 for particulates within 1 year of issuance of this permit is required.

3.) Stack testing shall be done by a firm having a demonstrated ability for using EPA Method 5. The facility shall submit a stack testing protocol to the Department approval at least 45 days prior to testing. Testing shall be done during fluxing.

3.) The grain loading standard is 0.05 grains per dry standard cubic foot.

4.) The stack test report shall be submitted to the Department within 30 days of stack testing. The Department will review the report and if acceptable issue an approval.

Parameter Monitored: PARTICULATES

Upper Permit Limit: .05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 55: Compliance Certification

Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00005

Process: FUR

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 55.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

1.) Emission P-00005 consists of process FUR (EP 00510 and 00514). The facility shall monitor opacity of emissions from each furnace under maximum production (aluminum production) during the stack emission test which is required for particulates. This shall be done by making an EPA Method 9 observation during each stack test run. The results from the three opacity shall be used to establish a baseline opacity for each emission point in this emission unit under maximum expected production. The results and production rate shall be kept on site for five years. In the event an exceedance is recorded during the stack test, the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and schedule for compliance.

2.) This condition pertains to monitoring for opacity. Another condition applies to monitoring aluminum production. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 56: Compliance Certification
Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00005

Process: FUR



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Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 56.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- 1.) Emission P-00005 consists of process FUR (EP 00510 and 00514). The facility shall monitor opacity of emissions from each furnace at the request of the Department using EPA Method 9.

- 2.) The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2000.

Subsequent reports are due every 6 calendar month(s).

Condition 1-13: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 1-13.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00006

Process: HCU

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-13.2:

Compliance Certification shall include the following monitoring:



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

Monitoring Description:

- 1.) Emission Unit P-00006 consists of Process HCU which includes two heat cleaning ovens to remove paint, grease, oil, varnish, rubber and other combustible materials from metal parts. The parts are heated to 750 degrees Fahrenheit in an oven with an oxygen deficient atmosphere to enhance hydrocarbon decomposition. The process ovens have afterburner control devices to control the hydrocarbon emissions. The primary burners and afterburners are on only during the heat cycle of the heat cleaning oven.
- 2.) The emissions from this process after control are limited to 0.05 grains per scf. The Department, at its option, may request the facility to stack test to verify compliance.
- 3.) The temperature of the afterburner exhausts shall be measured by in-stack continuous temperature monitoring and recording devices. The afterburners shall be in use whenever the ovens are in use. An oven will shutdown whenever the afterburner exhaust temperature drops below 1300 degrees Fahrenheit. Any event when the temperature drops below 1400 degrees Fahrenheit during the heat cycle shall be logged and an explanation given on the cause of the problem and how it was corrected. Recurring problems with the afterburner maintaining the required 1400 degree temperature during the heat cycle shall be reported to the Department in writing along with a program for correction. Temperature recordings and logs shall be retained on site for a minimum of 5 years and be made available upon request to the Department during normal business hours.
- 4.) The compliance status of this monitoring condition shall be reported to the Department semi-annually during each calendar year.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1400 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 30 days after the reporting period.
The initial report is due 7/30/2004.
Subsequent reports are due every 6 calendar month(s).

Condition 1-14: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Replaces Condition(s) 58

Item 1-14.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00006
Process: HCU

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 1-14.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- 1.) Emission Unit P-00006 consists of Process HCU which includes two heat cleaning ovens to remove paint, grease, oil, varnish, rubber and other combustible materials from metal parts. The parts are heated to 750 degrees Fahrenheit in an oven with an oxygen deficient atmosphere to enhance hydrocarbon decomposition. The process ovens have afterburner control devices to control the hydrocarbon emissions. The primary burners and afterburners are on only during the heat cycle of the heat cleaning oven.
- 2.) The smoke opacity from these emission points shall not exceed 20% during any 6 minute period. The Department, at its option, may request the facility to conduct an opacity observation in accordance with EPA Method 9.
- 3.) The compliance status of this monitoring condition shall be reported to the Department semi-annually during each calendar year.

Parameter Monitored: OPACITY



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Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2004.
Subsequent reports are due every 6 calendar month(s).

Condition 1-15: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2.6

Item 1-15.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00007

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-15.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This emission unit and process have been discontinued and the trichloroethylene degreaser has been permanently removed from service on August 11, 1999. The facility has requested emission reduction credits (ERCs) for volatile organic compounds (VOC) under Part 231-2. The average emissions for the two years prior to the degreaser being discontinued were 4.5 tons per year. Emissions were vented through EP 00600 located at 400 Main Street in Arcade, Wyoming County. The ERCs are being certified subject to the following qualifying conditions:

- 1.) VOC emissions from the vapor degreaser (emission point 00600) shall be permanently discontinued and any further emissions from this source are permanently prohibited.
- 2.) 4.5 tons per year of VOC - ERCs may be used for either offsets or netting purposes for major facility



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permitting under Part 231-2.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 59: Compliance Certification

Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(b)

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00008

Process: SCR

Regulated Contaminant(s):

CAS No: 011103-86-9 POTASSIUM ZINC CHROMATE HYDROXIDE

Item 59.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emission unit P00008 consists of Process SCR and emission points 00515, 00519 and 00522. The process is the surface coating of parts using zinc chromate based primers. Air Guide 1 gives chromates a high toxicity rating. Therefore, under the Air Guide 1 policy the particulate emissions from this process have been given an "A" rating. In order to meet the 99+% control requirements of Table 2 for chromate emissions, an "A" rated contaminant, the facility has installed high efficiency filters. The manufacturer rates the efficiency at 99.71% for particulates > 1 micron in diameter. This condition, therefore, requires the continued use and maintenance of these high efficiency filters according to the following:

1.) Each emission source shall be controlled by a high-efficiency air filter. High efficiency filter is one which delivers at least 99.7% control efficiency for particles >1 micron in diameter according to manufacturer's specifications.

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- 2.) Each emission source in this emission unit shall have a gauge to measure pressure drop across the air filter.
- 3.) The facility shall gather data to establish a normal pressure drop range.
- 4.) The pressure drop across the filter shall be measured weekly and recorded in a log. The log shall be kept on site for five years and made available for Department inspection during normal business hours.
- 5.) The compliance status of this monitoring condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PRESSURE CHANGE
Monitoring Frequency: WEEKLY
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2000.
Subsequent reports are due every 6 calendar month(s).

Condition 1-16: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 1-16.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00009
Process: SMT

Item 1-16.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require



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the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance observations during operation at the monitoring frequency stated below. These observations include pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure this source to be in compliance with the particulate emission rate.

Additionally, the permittee will immediately investigate any instance where there is cause to believe that particulate emissions above 0.05 gr/dscf are occurring or have occurred from a process source. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. During these instances the permittee shall determine the cause, make the necessary correction, and verify that the excess emissions problem has been corrected.

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

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 1-17: Compliance Certification

Effective between the dates of 06/07/2004 and Permit Expiration Date

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Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 1-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00009

Process: SMT

Item 1-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress

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report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

Subsequent reports are due every 6 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: 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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 1-18: Contaminant List

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 1-18.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this



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permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 011103-86-9

Name: POTASSIUM ZINC CHROMATE HYDROXIDE

CAS No: 0NY998-00-0

Name: VOC

Condition 1-19: Unavoidable noncompliance and violations

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 1-19.1:

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 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.



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(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 2-5: Facility Permissible Emissions

Effective between the dates of 04/12/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 2-5.1:

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

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

CAS No: 0NY998-00-0 (From Mod 2) PTE: 28,800 pounds per year

Name: VOC

Condition 2-6: Capping Monitoring Condition

Effective between the dates of 04/12/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 2-6.1:

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 231-2.6(a)

Item 2-6.2:

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

Item 2-6.3:



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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 2-6.4:

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 2-6.5:

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 2-6.6:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: P-00001

Process: SVP

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-6.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The Department certified emission reduction credits (ERCs) of 43.5 tons per year (tpy) of VOC (Department acknowledgment letter dated March 3, 1997) for reducing emissions from Emission Unit P-00001 including the conveyORIZED varnish dip and oven dry process for stators and other electrical parts (emission points 00326, 00333 and 00335) and the elimination of a vapor degreaser (emission point 00354). Based on receiving these emission reduction credits, the VOC emissions from Process SVP and emission points 00326, 00333, and 00335 were limited to a maximum of 19,800 pounds for any consecutive 12-month period.

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On June 4, 2004, emission reduction credits of 4.5 tpy or 9,000 pounds per year (lbs/yr) of VOC were certified by the Department, for the elimination of an additional vapor degreaser (Emission Unit P-00007/Emission Point 00600). See condition 1-15 for information on these emission reduction credits.

Due to an increase in the demand for stators and other electrical equipment produced by Process SVP, Prestolite requested an increase of 4.5 tpy in the VOC maximum annual potential (MAP) of Emission Unit P-00001 that was established by the prior emission reduction credit certified at the emission unit. To maintain the permanency of the 43.5 tons of ERCs, which were originally created from emission reductions in connection with process SVP at emission unit P-00001, Prestolite will reassign the 4.5 tpy of VOC emission reduction credits certified from Emission Unit P-00007/Emission Point 00600.

As such, the approved reassignment of the 4.5 tpy of VOC ERCs results in a new VOC MAP for Emission Unit P-00001 of 28,800 pounds per any consecutive 12-month period.

The following requirements must be completed by Prestolite to insure the VOC emission limit is maintained:

- 1.) VOC emissions from Emission Unit P-00001 (the conveyORIZED varnish operation, process SVP), shall not exceed 28,800 pounds for any consecutive 12-month period. The facility shall track VOC consumption in this process and log the quantity monthly. The log shall be maintained for five years and made available to the Department upon request at the facility during normal business hours. VOC consumption shall include all VOC in the as-received coating and any solvent added to the tank(s).
- 2.) VOC emissions from the two vapor degreasers and emission points 00354 and 00600 shall be permanently discontinued and any future VOC emissions from these processes are prohibited.
- 3.) The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: VOC
Upper Permit Limit: 28800 pounds per year
Monitoring Frequency: MONTHLY



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Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 70: Air pollution prohibited

Effective between the dates of 02/17/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 70.1:

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

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

Condition 1-20: Process Permissible Emissions

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 1-20.1:

The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: P-00009 Process: SMT

CAS No: 0NY210-00-0 (From Mod 1)

Name: OXIDES OF NITROGEN

PTE(s): 57 pounds per hour

90,000 pounds per year

Condition 1-21: Capping Monitoring Condition

Effective between the dates of 06/07/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 1-21.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of



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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 231-2

Item 1-21.2:

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

Item 1-21.3:

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 1-21.4:

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 1-21.5:

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 1-21.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00009

Process: SMT

Regulated Contaminant(s):

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

Item 1-21.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

- 1.) New Emission Unit P-00009 includes the operation of nine engine test stands used to evaluate the performance of the starter motors manufactured at Prestolite. Oxides of nitrogen (NO_x) emissions from this new emission unit

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are limited to 50 tons during any 12 month period.

2.) In this process a starter motor is connected to an engine and the starter is run through an industry standard test cycle. The test cycle consists of starting an engine, operating the engine for 5 seconds, and then shutting down the engine for about 25 seconds. Generally, each starter completes two start cycles per minute for a continuous period of about two weeks until the test cycle is satisfied. The diesel engines (ranging in horsepower from 250 to 399, maximum) are not designed to be operating on a continuous basis and the projected maximum NOx emissions from the project are 41.4 tons per year (tpy). If the engines are operated continuously, there is a potential for the NOx emissions from this project to exceed the major source threshold of 100 tpy. As such, the Department reviewed this project as a potential major source at an existing non-major facility for NOx emissions as specified in 6NYCRR Part 231-2, New Source Review. To ensure NOx emissions remain below the proposed emissions, the Department is requiring Prestolite to establish a federally-enforceable emission limit on the NOx emissions from this source.

3.) The facility shall demonstrate compliance with this limit by monitoring NOx emissions as follows:

a.) Prestolite shall monitor the time each starter test engine is on and record the number of horsepower-hours that were accumulated each month.

b.) Prestolite shall calculate the monthly NOx emissions from the process based on the maximum horsepower per engine, the actual engine running time, and the NOx emission factor of 1.85E-02 lb NOx/hp-hr, or other approved emission factor. The NOx emission factor is from the Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling - Compression-Ignition, EPA420-P-02-016, dated November 2002.

c.) Prestolite shall compute the annual NOx emission rate monthly using a rolling 12-month period. The monthly and 12 month total emissions shall be recorded in a log kept on site. This log shall be made available to the Department for review during normal business hours.

4.) The facility shall certify annually that NOx



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emissions have been maintained below the 50 tpy limit. All certification reports shall be submitted to the Department at 270 Michigan Avenue, Buffalo, NY 14203.

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 50 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2004.
Subsequent reports are due every 6 calendar month(s).