



**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: 10/29/2007 Expiration Date: 10/28/2012  
Mod 1 Effective Date: 10/21/2010 Expiration Date: 10/28/2012

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

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

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

Description:

1.) This is a minor permit modification to the existing Title V Renewal permit for installation of a new varnish vacuum chamber and curing oven. The process is used to varnish a motor starter with a compliant coating. The process does not result in any new applicable regulatory requirements. The emission source IDs added to the permit include I637A and I637B. The emission point ID added to the permit includes 00637.

2.) This permit modification also includes a revision to permit condition #30 renumbered in this permit modification as condition # 1-3. The revision is a result of a request from Prestolite on October 6, 2009 regarding the VOC RACT re-evaluation requirement. Specifically, condition #30 of the Title V Renewal Permit required the completion of a full VOC RACT analysis following Air Guide 20 procedures. It was requested that the VOC RACT re-evaluation include only process change, material reformulation & substitution alternatives and not require an economic evaluation of add-on air pollution control options. In a letter from the department dated October 26, 2009, it was concluded a full VOC RACT analysis is not required and Prestolite shall continue using the existing variance requirements as specified in the initial Title V permit. Condition #1-3 contains the language from the initial Title V permit for the VOC RACT analysis.



3.) This permit modification includes a revision to condition #45 renumbered in this permit modification as condition #1-4. The revision includes a correction to the limit of aluminum purchases from 250 tons per year to 250 tons per month.

4.) The last change contained in this permit modification includes a correction. Specifically, emission sources I0516, I0526, I0555, I0630, K0516, K0526, K0555, and K0630 have been removed from Process SCC and added to Process RVP.

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: DOUGLAS E BORSCHEL  
270 MICHIGAN AVE  
BUFFALO, NY 14203-2999

Authorized Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
- Submission of application 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 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted to the Department at least 30 days before expiration of the permit.



**Condition 4: Applications for Permit Renewals and Modifications**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

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 4.2:**

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 4.3:**

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

**Condition 5: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Replaced by Condition(s) 1-1**

**Item 5.1:**

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 1-1: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Replaces Condition(s) 5**

**Item 1-1.1:**

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,



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

**Item 6.1:**

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.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 7: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Replaced by Condition(s) 1-2**

**Item 7.1:**

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

**Condition 1-2: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Replaces Condition(s) 7**

**Item 1-2.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165



**New York State Department of Environmental Conservation**

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

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

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

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

Mod 0 Permit Effective Date: 10/29/2007

Permit Expiration Date: 10/28/2012

Mod 1 Permit Effective Date: 10/21/2010

Permit Expiration Date: 10/28/2012



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.5 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR Part 215: Open Fires Prohibited at Industrial and Commercial Sites
  - 1-1 6 NYCRR 215.2: Open Fires - Prohibitions
  - 10 6 NYCRR 200.7: Maintenance of Equipment
  - 11 6 NYCRR 201-1.7: Recycling and Salvage
  - 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
  - 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
  - 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
  - 15 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
  - 16 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
  - 17 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
  - 18 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
  - 1-2 6 NYCRR 202-1.1: Required Emissions Tests
  - 20 6 NYCRR 211.3: Visible Emissions Limited
  - 21 40 CFR Part 68: Accidental release provisions.
  - 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
  - 23 6 NYCRR Subpart 201-6: Emission Unit Definition
  - 24 6 NYCRR 201-6.5 (g): Non Applicable requirements
  - 25 6 NYCRR Subpart 201-7: Facility Permissible Emissions
  - \*26 6 NYCRR Subpart 201-7: Capping Monitoring Condition
  - \*27 6 NYCRR Subpart 201-7: Capping Monitoring Condition
  - 28 6 NYCRR 212.6 (a): Compliance Certification
  - 29 6 NYCRR 228-1.1 (e) (13): Compliance Certification
  - 1-3 6 NYCRR 228-1.3 (e): Compliance Certification
  - 31 6 NYCRR 228-1.4: Compliance Certification
  - 32 6 NYCRR 228-1.5: Compliance Certification
  - 33 6 NYCRR 228-1.6: Prohibition of sale
  - 34 6 NYCRR 228-1.7: Compliance Certification
  - 35 6 NYCRR 228-1.7: Compliance Certification
  - 36 6 NYCRR 228-1.10: Compliance Certification

#### Emission Unit Level

- 37 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 38 6 NYCRR Subpart 201-6: Process Definition By Emission Unit
- 39 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions
- 40 6 NYCRR Subpart 201-7: Process Permissible Emissions



**EU=P-00001,Proc=SVP**

\*41 6 NYCRR Subpart 201-7: Capping Monitoring Condition

**EU=P-00002,Proc=SCC**

42 6 NYCRR 212.4 (c): Compliance Certification

**EU=P-00003,Proc=SOL**

43 6 NYCRR 212.4 (c): Compliance Certification

**EU=P-00004,Proc=DCP**

44 6 NYCRR 212.4 (c): Compliance Certification

**EU=P-00005,Proc=FUR**

1-4 6 NYCRR 212.4 (c): Compliance Certification

**EU=P-00006,Proc=HCU**

46 6 NYCRR 212.4 (c): Compliance Certification

**EU=P-00009,Proc=SMT**

\*47 6 NYCRR Subpart 201-7: Capping Monitoring Condition

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

48 ECL 19-0301: Contaminant List

1-5 6 NYCRR 201-1.4: Unavoidable noncompliance and violations

1-6 6 NYCRR 211.2: Air pollution prohibited

NOTE: \* preceding the condition number indicates capping.



**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: Emergency Defense - 6 NYCRR 201-1.5**

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

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

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

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

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

**Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



**Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 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 D: Certification by a Responsible Official - 6 NYCRR 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 E: Requirement to Comply With All Conditions - 6 NYCRR 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 renewal application.

**Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 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 G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 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 H: Property Rights - 6 NYCRR 201-6.5 (a) (6)**

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



**Item I: Severability - 6 NYCRR 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 J: Permit Shield - 6 NYCRR 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 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 K: Reopening for Cause - 6 NYCRR 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 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 L: Permit Exclusion - ECL 19-0305**

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



(NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M:** **Federally Enforceable Requirements - 40 CFR 70.6 (b)**  
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.**

**Condition 1: Acceptable Ambient Air Quality**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 200.6**

**Item 1.1:**  
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Condition 2: Fees**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (7)**

**Item 2.1:**  
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

**Condition 3: Recordkeeping and reporting of compliance monitoring**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

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

**Item 3.1:**



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.

**Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.**

**Effective between the dates of 10/29/2007 and 10/28/2012**

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

**Item 4.1:**

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 5: Compliance Certification**

**Effective between the dates of 10/29/2007 and 10/28/2012**

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

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

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 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 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 1/30/2008.  
Subsequent reports are due every 6 calendar month(s).



**Condition 6: Compliance Certification**  
Effective between the dates of 10/29/2007 and 10/28/2012

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

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

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.
- iv. All compliance certifications shall be submitted to

**New York State Department of Environmental Conservation**

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



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 1/30/2008.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 202-2.1**

**Item 7.1:**  
The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due by April 15th for previous calendar year



**Condition 8: Recordkeeping requirements**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 202-2.5**

**Item 8.1:**

(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 9: Open Fires Prohibited at Industrial and Commercial Sites**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR Part 215**

**Item 9.1:**

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

**Condition 1-1: Open Fires - Prohibitions**  
**Effective between the dates of 10/21/2010 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 1-1.1:**

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

**Item 1-1.2**

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.



- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.**

**[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]**

**Condition 10: Maintenance of Equipment  
Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 10.1:**

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

**Condition 11: Recycling and Salvage  
Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 201-1.7**



**Item 11.1:**

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

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**

**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 201-1.8**

**Item 12.1:**

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

**Condition 13: Exempt Sources - Proof of Eligibility**

**Effective between the dates of 10/29/2007 and 10/28/2012**

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

**Item 13.1:**

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. 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 this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

**Condition 14: Trivial Sources - Proof of Eligibility**

**Effective between the dates of 10/29/2007 and 10/28/2012**

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

**Item 14.1:**

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

**Condition 15: Standard Requirement - Provide Information**

**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (4)**



**Item 15.1:**

The owner and/or operator 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. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 16: General Condition - Right to Inspect**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (8)**

**Item 16.1:**

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart 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 emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Condition 17: Standard Requirements - Progress Reports**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (d) (5)**

**Item 17.1:**

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

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

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

**Condition 18: Off Permit Changes**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (f) (6)**



**Item 18.1:**

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 provision 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 as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

**Condition 1-2: Required Emissions Tests**  
**Effective between the dates of 10/21/2010 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Replaces Condition(s) 19**

**Item 1-2.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 20: Visible Emissions Limited**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 211.3**

**Item 20.1:**

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

**Condition 21: Accidental release provisions.**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:40 CFR Part 68**

**Item 21.1:**

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

**New York State Department of Environmental Conservation**

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



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

**Condition 22:     Recycling and Emissions Reduction**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:40CFR 82, Subpart F**

**Item 22.1:**

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 23:     Emission Unit Definition**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 23.1(From Mod 1):**

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

Emission Unit: P-00002

Emission Unit Description:

Emission Unit P-00002 includes a roll dip varnish process, a varnish vacuum chamber, paint spray booths and a curing/drying oven for coating miscellaneous metal parts. The VOC emissions from these surface coating operations are regulated under 6NYCRR Part 228.7, Table 1 - Miscellaneous Metal Parts. Certain coatings used exceed the limit and are referenced in the Reasonably Available Control Technology (RACT) Plan. In addition, this emission unit uses low-use surface coatings for

New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



intermittent or specialty-type operations.

The particulate emissions from the paint booth processes are controlled using filters and are regulated under 6NYCRR Part 212.

Building(s): MAIN

**Item 23.2(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. The particulate and visible emissions from these sources are regulated by 6NYCRR Part 212.

Building(s): MAIN

**Item 23.3(From Mod 0):**

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 conveyORIZED varnish dip and oven dry surface coating operation. Miscellaneous metal parts are coated for use in extreme conditions. The VOC emissions from this process are in compliance with 6NYCRR Part 228.7, Table 1 - Miscellaneous Metal Parts.

The facility received emission reduction credits for reducing VOC emissions by using reformulated coatings. As part of the establishment of the emission reduction credits, Prestolite accepted an annual VOC cap for emissions from this emission unit.

Building(s): MAIN

**Item 23.4(From Mod 0):**

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. The particulate and visible emissions from these sources are regulated by 6NYCRR Part 212.

Building(s): MAIN

**Item 23.5(From Mod 0):**

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



Emission Unit: P-00004

Emission Unit Description:

Emission Unit P-00004 is an aluminum die casting operation. Particulate emissions result from oil-based lubricants forming an oil fume. The particulate and visible emissions from these sources are regulated by 6NYCRR Part 212.

Building(s): MAIN

**Item 23.6(From Mod 0):**

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

Emission Unit: P-00006

Emission Unit Description:

Emission Unit P-00006 is a metal heat cleaning operation. Particulate emissions result from the removal of combustible materials from metal parts. The particulate and visible emissions from these sources are regulated by 6NYCRR Part 212.

Building(s): MAIN

**Item 23.7(From Mod 0):**

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 and Alternator Test Stands (SMT) and one emission point, #00633. Eight test stands are used to test starter motors manufactured at the facility and one test stand is used to test alternators manufactured at the facility. The test stands are located in the Main building.

The Nitrogen Oxidides (NO<sub>x</sub>) emissions are limited to 50 tpy. The particulate and visible emissions are regulated under 6NYCRR Part 227-2.

Building(s): MAIN

**Condition 24: Non Applicable requirements  
Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (g)**

**Item 24.1:**

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

40 CFR Part 63, Subpart DDDDD

Reason: Prestolite is not subject to 40 CFR 63 Subpart DDDDD -  
National Emission Standards for Hazardous Air Pollutants



for Industrial, Commercial, and Institutional Boilers and Process Heaters. The facility is limiting the total and individual hazardous air pollutant emissions to less than major source thresholds.

40 CFR Part 63, Subpart M MMM

Reason: Prestolite is not subject to 40 CFR 63 Subpart M - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. The facility is limiting the total and individual hazardous air pollutant emissions to less than major source thresholds.

40 CFR Part 63, Subpart P P P P P

Reason: Prestolite is not subject to 40 CFR 63 Subpart P - National Emission Standards for Hazardous Air Pollutants: Engine Test Cell Stands. The facility is limiting the facility wide total and individual hazardous air pollutant emissions to less than major source thresholds.

40 CFR Part 63, Subpart R R R

Reason: Prestolite operates an aluminum die casting facility that only melts either clean charge or internal scrap. Prestolite does not operate sweat furnaces, thermal chip dryers, or scrap dryers/delacquering kilns/decoating kilns. Consequently, the aluminum die casting operation is not considered a "secondary aluminum production facility" and, therefore, is not subject to 40 CFR 63 Subpart R R R.

40 CFR Part 64

Reason: Prestolite does not operate Pollutant-Specific Emission Units (PSEU) at a major source that use a control device to achieve compliance with any emission limitation or standard. Therefore, Prestolite is not subject to the Compliance Assurance Monitoring (CAM) requirements.

**Condition 25: Facility Permissible Emissions**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 25.1:**

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

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

CAS No: 0NY100-00-0 (From Mod 1) PTE: 50,000 pounds  
per year  
Name: HAP



**Condition 26: Capping Monitoring Condition**  
Effective between the dates of 10/29/2007 and 10/28/2012

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 26.1:**

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:

- 40 CFR Part 63, Subpart DDDDD
- 40 CFR Part 63, Subpart MMMM
- 40 CFR Part 63, Subpart PPPPP

**Item 26.2:**

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

**Item 26.3:**

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 26.4:**

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 26.5:**

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 26.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 HAP

**Item 26.7:**

Compliance Certification shall include the following monitoring:

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



Monitoring Description:

Facility-wide emissions of total hazardous air pollutant (HAPs) from all emission sources, including exempt and trivial activities, shall not equal or exceed 25 tons per year (tpy) during any annual period. The facility has accepted this limitation to avoid applicability to 40 CFR 63 Subpart DDDDD/NESHAP for Industrial Boilers, 40 CFR 63 Subpart MMMM/NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, and 40 CFR 63 Subpart PPPPP/NESHAP for Engine Test Cell/Standards.

Prestolite shall track the emissions of HAPs by utilizing purchase records, MSDS information, and/or emission factors. All HAPs present shall be assumed to be emitted to the atmosphere. The specific estimating techniques for each Emission Unit, and for exempt and trivial sources are provided below. Monthly and rolling 12 month total HAP emissions shall be determined monthly within 30 days of the end of each 12 calendar month period. Prestolite shall track the actual daily usage of surface coatings, solvents, additives and cleaners in the event such records are needed to establish refined emissions estimates - in place of purchase records. Prestolite has indicated that this tracking system already exists for these compounds but routine usage of this data for capping compliance demonstration proves to be cumbersome and time consuming.

If the estimated HAP emissions exceed 80% of the regulatory threshold (8 tons/year for individual HAPs and 20 tons/year for aggregated HAPs), Prestolite will notify the Department and take the following steps:

- 1.) Conduct an inventory to confirm the amount of each HAP-containing chemical currently used by and stored at the facility.
- 2.) Utilize the inventory results to determine the source of the unanticipated levels of HAP emissions and to identify the root cause(s) of the increase.
- 3.) Usage records of specific compounds may be substituted for purchase records only where an accurate and up to date 12 month usage data base exists. Otherwise this substitution shall not mitigate any exceedance of a cap emission limit. Any proposed such substitution shall be explained to the Department in the facility's initial notification of exceedance of the 80% threshold.
- 4.) Begin steps to reduce HAP emissions from those processes that are the highest HAP emitters by locating



and using chemicals that meet process specification and contain lower HAP concentrations.

5.) Prepare and submit to the Department a 12-month rolling report on HAP emissions each quarter for as long as the HAP emissions exceed 80% of the regulatory threshold.

Following the completion of those steps, Prestolite will prepare a report to the Department that outlines the results of the steps taken. The Department will be requested to review and concur with the increased monitoring and product substitution steps that Prestolite would take to maintain HAP emissions below the regulatory threshold.



Specific HAP Emissions Monitoring Procedures

Emission Units P-00001, P-00002 & Exempt and Trivial Surface Coating Processes

Individual HAPS in each coating, solvent, additive and cleaner will be identified. The lb/gal of each HAP contaminant per product will be determined based on the product specifications. If the manufacture specifies a range of the contaminant then the highest value will be used. The facility will determine emissions on a monthly basis based on purchase records of each material (i.e., gallons per month). The individual HAP emissions for each product will be estimated as follows:

$\text{HAP 1 (lbs/gal)} \times \text{gallons of Product A purchased per month} = \text{lbs/mo of HAP 1 from Product A.}$

This will be repeated for each HAP and each product. The HAPS purchased will be considered to be emitted into the atmosphere.

Emission Unit P-00003 & Exempt and Trivial Manual Soldering Processes

HAP emissions of lead are emitted from this process. Prestolite has assumed that 0.5% of the solder purchased X actual % of lead content is emitted. Example calculation:

$\text{Pounds of solder purchased per month (lbs/mo)} \times 0.005 \times \text{Actual \% Lead} = \text{lbs/mo of Lead emitted.}$

Emission Unit P-00004

The lubricant currently used within this process does not contain HAPs. If Prestolite proposes to use a different lubricant, the HAP content of the new lubricant will be determined and the Department will be notified.

Emission Unit P-00005

HAP emissions of hydrogen fluoride are emitted from this process during the fluxing operations. AMLOX-110 contains 12% sodium silicofluoride. You have assumed less than 0.5% of the fluorine has the potential to combine with moisture in the stack and produce HF. As such, HF emissions will be estimated as follows:

$\text{Pounds of AMLOX-110 purchased per month (lbs/mo)} \times 12\% \text{ weight sodium silicofluoride} \times 61\% \text{ weight fluorine} \times 0.005$



= lbs/mo of HF emissions.

Emission Unit P-00006

This process removes paint, grease, oils, varnish, epoxy, rubber and other combustible materials from metal parts. Most of these materials contain or can produce HAP emissions. This source is controlled by an afterburner. As long as the afterburner operates as specified in the Title V Facility Air Permit, the HAP emissions will be assumed to be negligible (e.g., <0.1 tons per year of aggregate HAPs).

Emission Unit P-00009

The diesel engines emit formaldehyde and benzene that are HAPs. AP-42 emission factors are used to estimate the emissions. The formaldehyde emissions for each engine shall be estimated as follows:

# of hours each engine operated per month (hours/mo) X  
8.26E-06 (lbs formaldehyde/hp-hr) x engine hp = lbs  
formaldehyde/mo per engine.

The benzene emissions for each engine shall be estimated as follows:

# of hours each engine operated per month (hours/mo) X  
6.53E-06 (lbs benzene/hp-hr) x engine hp = lbs benzene/mo  
per engine.

Parameter Monitored: HAP  
Upper Permit Limit: 50000 pounds per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2008.  
Subsequent reports are due every 6 calendar month(s).

**Condition 27: Capping Monitoring Condition**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 27.1:**

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:

40 CFR Part 63, Subpart DDDDD

**New York State Department of Environmental Conservation**

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



40 CFR Part 63, Subpart Mmmm  
40 CFR Part 63, Subpart Ppppp

**Item 27.2:**

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

**Item 27.3:**

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 27.4:**

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 27.5:**

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 27.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 HAP

**Item 27.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility-wide emissions of individual hazardous air pollutant (HAPs) from all emission sources, including exempt and trivial activities, shall not equal or exceed 10 tons per year (tpy) during any annual period. The facility has accepted this limitation to avoid applicability to 40 CFR 63 Subpart DDDDD/NESHAP for Industrial Boilers, 40 CFR 63 Subpart Mmmm/NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, and 40 CFR 63 Subpart Ppppp/NESHAP for Engine Test Cell/Stand.

Prestolite shall track the emissions of HAPs by utilizing



purchase records, MSDS information, and/or emission factors. All HAPs present shall be assumed to be emitted to the atmosphere. The specific estimating techniques for each Emission Unit, and for exempt and trivial sources are provided below. Monthly and rolling 12 month total HAP emissions shall be determined monthly within 30 days of the end of each 12 calendar month period. Prestolite shall track the actual daily usage of surface coatings, solvents, additives and cleaners in the event such records are needed to establish refined emissions estimates - in place of purchase records. Prestolite has indicated that this tracking system already exists for these compounds but routine usage of this data for capping compliance demonstration proves to be cumbersome and time consuming.

If the estimated HAP emissions exceed 80% of the regulatory threshold (8 tons/year for individual HAPs and 20 tons/year for aggregated HAPs), Prestolite will notify the Department and take the following steps:

- 1.) Conduct an inventory to confirm the amount of each HAP-containing chemical currently used by and stored at the facility.
- 2.) Utilize the inventory results to determine the source of the unanticipated levels of HAP emissions and to identify the root cause(s) of the increase.
- 3.) Usage records of specific compounds may be substituted for purchase records only where an accurate and up to date 12 month usage data base exists. Otherwise this substitution shall not mitigate any exceedance of a cap emission limit. Any proposed such substitution shall be explained to the Department in the facility's initial notification of exceedance of the 80% threshold.
- 4.) Begin steps to reduce HAP emissions from those processes that are the highest HAP emitters by locating and using chemicals that meet process specification and contain lower HAP concentrations.
- 5.) Prepare and submit to the Department a 12-month rolling report on HAP emissions each quarter for as long as the HAP emissions exceed 80% of the regulatory threshold.

Following the completion of those steps, Prestolite will prepare a report to the Department that outlines the results of the steps taken. The Department will be requested to review and concur with the increased



monitoring and product substitution steps that Prestolite would take to maintain HAP emissions below the regulatory threshold.



### Specific HAP Emissions Monitoring Procedures

#### Emission Units P-00001, P-00002 & Exempt and Trivial Surface Coating Processes

Individual HAPS in each coating, solvent, additive and cleaner will be identified. The lb/gal of each HAP contaminant per product will be determined based on the product specifications. If the manufacture specifies a range of the contaminant then the highest value will be used. The facility will determine emissions on a monthly basis based on purchase records of each material (i.e., gallons per month). The individual HAP emissions for each product will be estimated as follows:

$\text{HAP 1 (lbs/gal)} \times \text{gallons of Product A purchased per month} = \text{lbs/mo of HAP 1 from Product A.}$

This will be repeated for each HAP and each product. The HAPS purchased will be considered to be emitted into the atmosphere.

#### Emission Unit P-00003 & Exempt and Trivial Manual Soldering Processes

HAP emissions of lead are emitted from this process. Prestolite has assumed that 0.5% of the solder purchased X actual % of lead content is emitted. Example calculation:

$\text{Pounds of solder purchased per month (lbs/mo)} \times 0.005 \times \text{Actual \% Lead} = \text{lbs/mo of Lead emitted.}$

#### Emission Unit P-00004

The lubricant currently used within this process does not contain HAPs. If Prestolite proposes to use a different lubricant, the HAP content of the new lubricant will be determined and the Department will be notified.

#### Emission Unit P-00005

HAP emissions of hydrogen fluoride are emitted from this process during the fluxing operations. AMLOX-110 contains 12% sodium silicofluoride. You have assumed less than 0.5% of the fluorine has the potential to combine with moisture in the stack and produce HF. As such, HF emissions will be estimated as follows:

$\text{Pounds of AMLOX-110 purchased per month (lbs/mo)} \times 12\% \text{ weight sodium silicofluoride} \times 61\% \text{ weight fluorine} \times 0.005$



= lbs/mo of HF emissions.

Emission Unit P-00006

This process removes paint, grease, oils, varnish, epoxy, rubber and other combustible materials from metal parts. Most of these materials contain or can produce HAP emissions. This source is controlled by an afterburner. As long as the afterburner operates as specified in the Title V Facility Air Permit, the HAP emissions will be assumed to be negligible (e.g., <0.1 tons per year of aggregate HAPs).

Emission Unit P-00009

The diesel engines emit formaldehyde and benzene that are HAPs. AP-42 emission factors are used to estimate the emissions. The formaldehyde emissions for each engine shall be estimated as follows:

# of hours each engine operated per month (hours/mo) X  
8.26E-06 (lbs formaldehyde/hp-hr) x engine hp = lbs  
formaldehyde/mo per engine.

The benzene emissions for each engine shall be estimated as follows:

# of hours each engine operated per month (hours/mo) X  
6.53E-06 (lbs benzene/hp-hr) x engine hp = lbs benzene/mo  
per engine.

Parameter Monitored: HAP

Upper Permit Limit: 20000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 28: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 28.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: P-00003

Process: SOL



Emission Unit: P-00004  
Process: DCP

Emission Unit: P-00005  
Process: FUR

Emission Unit: P-00006  
Process: HCU

Emission Unit: P-00009  
Process: SMT

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

**Item 28.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- 1.) 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.
- 2.) On-going compliance monitoring of the opacity limit for the automated soldering operation, aluminum die casting operation, reverberatory furnaces, heat cleaning ovens, and test cells shall be monitored as follows:
  - a.) A weekly visible emission survey of each emission point shall be completed whenever a process is in operation.
  - b.) Visible emission observations shall be performed, as best as possible, at a location to obtain the proper sun angle, background, and line of sight. The observer must be knowledgeable regarding the effects on the visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor);
  - c.) Document if visible emissions are observed and whether the emissions are within normal conditions or above normal conditions. Normal conditions may be zero percent opacity for many or all emission sources;
  - d.) If visible emissions above those that are normal and in compliance are observed, an inspection of the



source shall be completed, corrective action taken, and the source restored to its normal operation as expeditiously as practicable.

e.) If visible emissions above those that are normal continue to be present after corrections are made, then a certified trained observer shall conduct a minimum six minute opacity observation according to EPA Method 9 within the next operating day of the source;

f.) If an exceedance of the 20 percent opacity limit is documented during the Method 9 opacity evaluations, then the facility shall notify the Department within two business days and provide a written report of the results within 30 calendar days along with a proposed program for correction and a schedule for compliance.

3.) Records shall be maintained and include the following information: date, time, staff name, results of the visible emission survey, results of any Method 9 evaluations, results of each inspection, and a description of the corrective action taken. The records shall be kept on-site and be made available to the Department upon request.

4.) An exceedance of the 20 percent opacity limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. 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: WEEKLY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 29: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement: 6 NYCRR 228-1.1 (e) (13)**

**Item 29.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: P-00001

Emission Unit: P-00002



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

**Item 29.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

1.) 6NYCRR Part 228 VOC coating limits do not apply to low-use surface coatings used for intermittent or speciality-type operations, where the combined facility-wide total usage of all coatings is 55 gallons or less on a 12-month rolling basis.

2.) Prestolite currently uses one low-use specialty coating as follows:

Prestolite Part Number: P075097651  
Coating Name: Styrene Epoxy Varnish  
Coating Manufacturer: Ranbar

3.) On-going compliance monitoring of the 55 gallon combined total usage for all specialty surface coatings shall be monitored as follows:

a.) Purchase records shall be maintained in a format acceptable to the Department and document combined facility wide total usage of all low-use specialty coatings on a twelve month rolling basis. The records shall be kept on-site and be made available to the Department upon request.

b.) The Department shall be notified within 10 business days of using a new low-use specialty coating.

c.) If an exceedance of the 55 gallon limit is documented, then the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and a schedule for compliance.

4.) Each monthly exceedance of the 55 gallon limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. 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: COATING  
Upper Permit Limit: 55 gallons  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-3: Compliance Certification**  
**Effective between the dates of 10/21/2010 and 10/28/2012**

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

**Replaces Condition(s) 30**

**Item 1-3.1:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 1-3.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- 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 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 continuance of the existing RACT variance, then 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 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 1/30/2011.

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

**Condition 31: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.4**

**Item 31.1:**

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: RVP

Emission Unit: P-00002

Process: SCC



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

**Item 31.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

1.) No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to Part 228.

2.) On-going compliance monitoring of the opacity limit for the surface coating processes shall be monitored as follows:

a.) A weekly visible emissions survey of each emission point shall be completed whenever a process is in operation.

b.) Visible emission observations shall be performed, as best as possible, at a location to obtain the proper sun angle, background, and line of sight. The observer must be knowledgeable regarding the effects on the visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor);

c.) Record if visible emissions (>0% opacity) are observed or not. Condensing water vapor is not considered visible emissions;

d.) If visible emissions are observed, an inspection of the source shall be completed, corrective action taken, and the source restored to its normal operation as expeditiously as practicable.

e.) If the corrective actions do not eliminate visible emissions, then a trained observer shall conduct a minimum six minute opacity observation according to EPA Method 9 within the next operating day of the source;

f.) If an exceedance of the 20 percent opacity limit is documented during the Method 9 opacity evaluations, then the facility shall notify the Department within two business days and provide a written report of

New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



the results within 30 calendar days along with a proposed program for correction and a schedule for compliance.

3.) Records shall be maintained and include the following information: date, time, staff name, results of the visible emission survey, results of any Method 9 evaluations, results of each inspection, and a description of the corrective action taken. The records shall be kept on-site and be made available to the Department upon request.

4.) An exceedance of the 20 percent opacity limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. 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: WEEKLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 32: Compliance Certification**

**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.5**

**Item 32.1:**

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: RVP

Emission Unit: P-00002

Process: SCC

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 32.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

(a) The owner or operator of any emission source subject to Part 228 must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department. Any facility required to perform the overall removal efficiency calculation set forth in Equation 2 of this Part, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department.

(b) The owner and operator of any emission source subject to this Part must, upon request by the department, use Method 311 or Method 24 as presented in Appendix A of both 40 CFR parts 63 and 60, respectively (see table 1, section 200.9 of this Title), to measure the volatile content, water content, density, volume of solids, and weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration.

(c) When the sampling and analysis methods referenced in subdivision (b) or (f) or paragraph (e)(2) of this section are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

(d) Representatives of the department must be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with this Part.

(e) When a coating line utilizes control equipment to comply with the provisions of this Part, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

(1) This determination may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.



Methods provided for in subdivision (b) or (c) of this section must be used.

(2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods are provided for in the following table. Methods 204 through 204F are provided for in Appendix M of 40 CFR part 51 (see table 1, section 200.9 of the Title). The approved test methods for determining the efficiency of the control equipment are provided for in subdivision (f) of this section.

Alternative CE protocols and test methods may be allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the EPA guidance document entitled Guidelines for Determining Capture Efficiency (see table 1, section 200.9 of this Title). The alternative CE protocols and test methods must be approved in advance by the department. Also, the multiple line testing procedures outlined in the above guidance document can be used to determine CE if the applicable criteria are satisfied. The multiple line testing CE protocols and test methods must be approved in advance by the department.

(f) The owner and/or operator of a surface coating process must follow the applicable notification requirements, protocol requirements and test procedures of Part 202 of this Title for testing and monitoring. Depending upon conditions at a test site, one of the following test methods from Appendix A of 40 CFR part 60 (see Table 1, section 200.9 of this Title) must be used when measuring VOC concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;

(2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or

(3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

(g) If an air cleaning device is used, continuous monitors for the following parameters must be installed, periodically calibrated, and operated when the associated control equipment is operating:



- (1) exhaust gas temperature of all incinerators;
  - (2) temperature rise across catalytic incinerator bed;
  - (3) breakthrough of VOCs on a carbon absorption unit; and
  - (4) any other continuous monitoring or recording device required by the department.
- (h) Every owner or operator of a facility which is not subject to the VOC control requirements set forth in section 228.3 of this Part because its annual potential to emit VOCs is below the thresholds set forth in section 228.1 of this Part must maintain records in a format acceptable to the department that verify the facility's annual potential to emit VOCs. Upon request, these records must be submitted to the department.
- (i) For each ED calculation performed under section 228.3(d) of this Part, the owner or operator of the coating system must record the following and make the records available to the department upon request: the name or identification of each coating; the coating parameters used in Equation 7, the individual ED values for each coating, and the ED value calculated for the coating system.
- (j) Any information or record showing noncompliance with the requirements of this Part must be reported to the department within 30 days following notice or generation of the information or record.
- (k) All records required by this section must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 33: Prohibition of sale**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.6**

**Item 33.1:**

(A) No person shall sell, specify, or require for use the application of a coating on a part or product at a facility with a coating line described in table 1 or 2 in section 228.7 or 228.8 of 6

**New York State Department of Environmental Conservation**

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



NYCRR 228 if such use is prohibited by any of the provisions of this Part. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at this facility. This prohibition shall not apply to the following:

(1) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in tables 1 and 2 of sections 228.7 or 228.8 of 6 NYCRR Part 228;

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

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

(B) Any person selling a coating for use in a coating line subject to this Part must, upon request, provide the user with certification of the VOC content of the coating supplied.

**Condition 34: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement: 6 NYCRR 228-1.7**

**Item 34.1:**

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: RVP

Emission Unit: P-00002

Process: SCC

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 34.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

1.) Extreme Performance Coatings designed for harsh exposure or extreme environmental conditions and used for the surface coating of miscellaneous metal parts and products may contain a maximum of 3.5 pounds of volatile organic compounds (VOC) per gallon of coating (minus water and excluded VOC), as applied.



- 2.) At the time of this permit renewal, all of the coatings used at Prestolite have been classified as extreme performance coatings.
- 3.) On-going compliance monitoring of the VOC limit for the surface coating materials shall be monitored as follows:
  - a.) Once per permit term, collect and analyze one random *as-applied* sample of each extreme performance coating. Coatings that are referenced in the most recent version of the Reasonably Available Control Technology (RACT) Plan or coatings that are listed in the current version of the permit as low-use specialty coatings shall not be sampled.
  - b.) Within 60 days of permit issuance, Prestolite shall submit a schedule for demonstrating compliance with the VOC limit. This schedule shall outline the following at a minimum: Date of submission of sampling and analysis protocol for Department review, proposed date of sampling, and proposed date of submission of sampling results. The sampling and analysis shall take place within 3 years of permit issuance.
  - c.) The use of new extreme performance coatings shall be approved by the Department prior to use based on the technical product data information, Method 24 analytical data, parts description, and the intended use of the coating on the part. Sampling and analysis of any new *as-applied* coating may be required if the scheduled permit term sampling has already occurred or is scheduled more than one year in advance.
  - d.) All reporting, record keeping, sampling and analysis procedures stated in 6NYCRR Part 228.5 shall be followed.
  - e.) The Department shall be notified 10 days prior to the scheduled sample date so a Department representative may be present during the sampling. The Department has the option to collect a split sample.
- 4.) An exceedance of the 3.5 pounds of VOC per gallon of coating limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

**New York State Department of Environmental Conservation**

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: EXTREME PERFORMANCE COATING - MISCELLANEOUS METAL PARTS

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: EPA method 24

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 35: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.7**

**Item 35.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Based on the coating definitions of 6NYCRR Part 228, Prestolite currently does not use clear coatings. Prior to using a clear coating, Prestolite shall submit a permit modification to the Department for review and approval.

The permit modification shall include sufficient information to determine the use and classification of the coating. This information shall include, but not limited to, technical product data information, Method 24 analytical data, parts description, and the intended use of the coating on the part.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 36: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.10**

**Item 36.1:**

The Compliance Certification activity will be performed for the Facility.



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

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:
  - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
  - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
  - (3) disassembling and cleaning of the spray gun in a vat



that is kept closed when not in use; or

(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: WEEKLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2008.  
Subsequent reports are due every 6 calendar month(s).

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

**Condition 37: Emission Point Definition By Emission Unit  
Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 37.1(From Mod 1):**

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

Emission Unit: P-00002

Emission Point: 00637

Height (ft.): 49

Diameter (in.): 16

Building: MAIN

**Item 37.2(From Mod 0):**

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 37.3(From Mod 0):**

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: 00254  
Height (ft.): 46 Diameter (in.): 23  
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  
Height (ft.): 49 Diameter (in.): 17  
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00515  
Height (ft.): 46 Diameter (in.): 15  
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: 00519  
Height (ft.): 30 Diameter (in.): 30  
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00520  
Height (ft.): 30 Diameter (in.): 18

**New York State Department of Environmental Conservation**  
Permit ID: 9-5620-00027/00153 Facility DEC ID: 9562000027



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
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
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 37.4(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 37.5(From Mod 0):**

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  
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 37.6(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 37.7(From Mod 0):**

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 37.8(From Mod 0):**

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 38: Process Definition By Emission Unit  
Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 38.1(From Mod 1):**

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, miscellaneous metal parts are varnished  
and dried.

Emission Source/Control: K0516 - Control  
Control Type: PAPER FILTER



Emission Source/Control: K0526 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0555 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0630 - Control  
Control Type: PAPER FILTER

Emission Source/Control: I0252 - Process

Emission Source/Control: I0516 - Process

Emission Source/Control: I0524 - Process

Emission Source/Control: I0525 - Process

Emission Source/Control: I0526 - Process

Emission Source/Control: I0555 - Process

Emission Source/Control: I0557 - Process

Emission Source/Control: I0630 - Process

Emission Source/Control: I254A - Process

Emission Source/Control: I254B - Process

Emission Source/Control: I637A - Process

Emission Source/Control: I637B - Process

**Item 38.2(From Mod 1):**

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:

In Process SCC, paint spray booths are used to apply surface coatings to miscellaneous metal parts. Certain coatings used in the process exceed the VOC limit and are referenced in the Reasonably Available Control Technology (RACT) Plan. In addition, this emission unit uses low-use surface coatings for intermittent or specialty-type operations.

These paint booths utilize particulate filters to control emissions of solids.

Emission Source/Control: K0260 - Control  
Control Type: PAPER FILTER



Emission Source/Control: K0265 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0392 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0401 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0511 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0515 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0519 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0520 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0522 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0523 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0551 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0552 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0553 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0554 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0556 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0631 - Control  
Control Type: PAPER FILTER

Emission Source/Control: K0632 - Control  
Control Type: PAPER FILTER

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
- Emission Source/Control: I0515 - Process
- Emission Source/Control: I0519 - Process
- Emission Source/Control: I0520 - Process
- Emission Source/Control: I0522 - Process
- Emission Source/Control: I0523 - Process
- Emission Source/Control: I0551 - Process
- Emission Source/Control: I0552 - Process
- Emission Source/Control: I0553 - Process
- Emission Source/Control: I0554 - Process
- Emission Source/Control: I0556 - Process
- Emission Source/Control: I0631 - Process
- Emission Source/Control: I0632 - Process

**Item 38.3(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

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 emissions from these furnaces are uncontrolled.

During the normal melting operations, only non-HAP particulates are emitted. However, for approximately one hour each day, approximately 18 pounds of a solid flux material is added to remove contaminants from the melt. During the fluxing operations, the furnaces emit particulates, hydrogen chloride and hydrogen fluoride. A screening analysis of the hydrogen chloride and hydrogen fluoride emissions was completed during the initial permit review. The potential impacts were below the screening



levels.

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 of 0.05 gr/dscf.

Emission Source/Control: SHAEF - Process

Emission Source/Control: WARWI - Process

**Item 38.4(From Mod 0):**

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 miscellaneous metal parts.

Emission Reduction Credits have been issued for this process. Total VOC emissions from this process can not exceed 28,800 lbs per year.

Emission Source/Control: I0326 - Process

Emission Source/Control: I0333 - Process

Emission Source/Control: I0335 - Process

**Item 38.5(From Mod 0):**

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. The emissions from this process are uncontrolled. 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 of 0.05 gr/dscf.

Emission Source/Control: REFLO - Process

Emission Source/Control: WAVE1 - Process

**Item 38.6(From Mod 0):**

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

Emission Unit: P-00004

Process: DCP

Source Classification Code: 3-04-001-14

**New York State Department of Environmental Conservation**

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



Process Description:

Process DCP includes six (6) die casting machines. In this process, molten aluminum is poured into steel molds that are compressed to form components. A water-based lubricant is applied to the steel molds to prevent the molten aluminum from adhering to the molds.

This process is uncontrolled and 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 of 0.05 gr/dscf.

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

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 38.7(From Mod 0):**

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 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. The emission are controlled using an afterburner.

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 of 0.05 gr/dscf.

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

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



Emission Source/Control: HEATC - Process

Emission Source/Control: HEATD - Process

**Item 38.8(From Mod 0):**

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 and Alternator Test Stands (SMT) and one emission point, #00633. Eight test stands are used to test starter motors manufactured at the facility and one test stand is used to test alternators 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).

For the starter motor testing, a starter motor or motors are connected to the appropriately sized diesel engine. 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.

For the alternator testing, an alternator is connected to the appropriately sized diesel engine. The motor is started and run at varying rpm's for 3000 hours.

The emissions from the engine test stands are uncontrolled. Exhaust from each of the nine engines are collected and emitted through one common stack.

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

New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



Emission Source/Control: OSMT8 - Process

Emission Source/Control: OSMT9 - Process

**Condition 39: Emission Unit Permissible Emissions**  
Effective between the dates of 10/29/2007 and 10/28/2012

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 39.1:**

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: P-00001

CAS No: 0NY998000 (From Mod 0)

Name: VOC

PTE(s): 28,800 pounds per year

3.29 pounds per hour

**Condition 40: Process Permissible Emissions**  
Effective between the dates of 10/29/2007 and 10/28/2012

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 40.1:**

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 0)

Name: OXIDES OF NITROGEN

PTE(s): 57 pounds per hour

100,000 pounds per year

**Condition 41: Capping Monitoring Condition**  
Effective between the dates of 10/29/2007 and 10/28/2012

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 41.1:**

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

6 NYCRR 231-2.6 (a)

**Item 41.2:**



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

**Item 41.3:**

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 41.4:**

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 41.5:**

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 41.6:**

The Compliance Certification activity will be performed for:

Emission Unit: P-00001  
Process: SVP

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

**Item 41.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

- 1.) On March 3, 1997, the Department certified Emission Reduction Credits (ERCs) created by Prestolite for reducing volatile organic compound (VOC) emissions from Emission Unit P-00001, Process SVP and for discontinuing the use of a vapor degreaser at emission point 00354. A total of 43.5 tons of VOC ERCs were sold to and used by Dart Container Corp of Pennsylvania. As part of the certification process, Prestolite was required to limit VOC emissions from Emission Unit P-00001, Process SVP to less than 19,800 pounds for any consecutive 12-month period.
- 2.) On June 4, 2004, emission reduction credits of 4.5



tons per year or 9,000 pounds per year (lbs/yr) of VOC were certified by the Department for the elimination of an additional vapor degreaser at Emission Unit P-00007/Emission Point 00600. The ERCs were reassigned to Emission Unit P-00001, Process SVP to accommodate an increase in production and maintain the permanency of the original 43.5 tons of ERCs.

3.) Based on the above ERC transactions, Prestolite is required to maintain the following:

a.) Total VOC emissions from all emission sources associated with Emission Unit P-00001, Process SVP (the conveyorized varnish operation), shall not exceed 28,800 pounds per year as determined by summing the individual monthly emissions during any consecutive 12 month period.

b.) The two vapor degreasers (emission points 00354 and 00600) were permanently discontinued and any future VOC emissions from these processes are prohibited.

4.) VOC emission calculations from Emission Unit P-00001, Process SVP shall be completed on a monthly basis. Prestolite shall calculate actual VOC emissions by assuming all VOCs used in the process are emitted to the atmosphere. At a minimum, the VOC emissions shall include: (1) all VOC in the as-received coating, (2) VOCs added to the coating to adjust the flowing properties of the material, such as the viscosity or pH, and (3) VOCs used in cleaning or preparation.

5.) The calculations and supporting documentation shall include the following or similar information to demonstrate the emission calculations are verifiable and enforceable:

a.) a current list of all VOC containing products used in Emission Unit P-00001, Process SVP. This list must include: information on the manufacturer, brand, product name or code, VOC content in pounds per gallon, or other manufacturer's product specifications, material content reports or laboratory analyses providing this information;

b.) a description of equipment used during and after VOC application, including type, make and model; maximum design process rate or throughput; all emission control unit information, as applicable; and a description of the VOC application and drying method(s) employed;

New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



c.) a monthly log of the purchase of each VOC product (including solvents used in clean up and surface preparation), and calculations showing compliance with the emission limit; and

d.) all purchase orders, invoices, and other documents to support information in the monthly log.

6.) An exceedance of the 28,800 pounds per year emission limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. 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

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 42: Compliance Certification**

**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 42.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-00002

Process: SCC

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 42.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

1.) Emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).



2.) On-going compliance monitoring of the particulate emission limit for the paint spray booths shall be monitored as follows:

a.) Each emission source shall be controlled by particulate air filter(s).

b.) Weekly differential pressure measurements of each paint spray booth shall be completed whenever a process is in normal operation.

c.) Differential pressure shall be measured between the inlet and outlet to the control device. The differential pressure meter shall be maintained through a scheduled maintenance program as specified by the manufacturer.

d.) If any pressure measurement is recorded outside the established indicator range, then you shall inspect the source, initiate corrective action, and restore operation of the emission unit (including the control device and associated capture system) to its normal operation as expeditiously as practicable.

e.) If the problem is corrected and the pressure measurement is within the established indicator range, then the results of the investigation shall be documented;

f.) If the facility is unable to correct the problem and the pressure measurement remains outside the indicator range, then the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and a schedule for compliance.

3.) Records shall be maintained to include: (1) a log of the weekly pressure drop measurements with reference to the approved differential pressure indicator range, (2) the date and time of the measurement, (3) corrective action taken (if any), and (4) the cause of any pressure measurements outside the indicator range (if known). The records shall be kept on-site and be made available to the Department upon request.

4.) Based on the results of the on-going compliance monitoring, if the Department determines there may be an exceedance of the 0.05 grains/dscf emission limit, then completion of an EPA Method 5 compliance test may be required.

5.) An exceedance of the 0.05 grains/dscf emissions

**New York State Department of Environmental Conservation**

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: WEEKLY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 43: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 43.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-00003

Process: SOL

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 43.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

1.) Emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).

2.) On-going compliance monitoring of the particulate emission limit for the automated soldering operation shall be monitored as follows:

a.) Each month the facility shall monitor solder usage based on purchase records of the bar solder used in this process.

b.) If the solder purchases are greater than 600 pounds per month, then potential particulate emissions shall be reevaluated using material balance calculations



based on the increase purchase rate.

c.) If the estimated particulate emission rate is less than the 0.05 grains/dscf limit, then the facility shall maintain records of the increased purchase rate and potential particulate emission rate.

d.) If the revised particulate emission calculation is greater than the 0.05 grains/dscf emission limit, then you shall inspect the source, initiate corrective action, and restore operation of the emission unit to its normal operation as expeditiously as practicable. The facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and a schedule for compliance.

3.) Records shall be maintained to include: (1) a monthly log of bar solder purchases, (2) revised emission calculations (if any), (3) inspection results, and (4) corrective action taken (if any). The records shall be kept on-site for five years and be made available to the Department upon request.

4.) Based on the results of the on-going compliance monitoring, if the Department determines there may be an exceedance of the 0.05 grains/dscf emission limit, then completion of an EPA Method 5 compliance test may be required.

5.) An exceedance of the 0.05 grains/dscf emissions limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.05 grains per dscf  
Reference Test Method: EPA Method 5  
Monitoring Frequency: MONTHLY  
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 44: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 44.1:**



The Compliance Certification activity will be performed for:

Emission Unit: P-00004  
Process: DCP

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

**Item 44.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- 1.) Emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).
- 2.) On-going compliance monitoring of the particulate emission limit for the aluminum die casting operation shall be monitored as follows:
  - a.) Each month the facility shall monitor the oil-based lubricant usage based on purchase records of the lubricant used in this process.
  - b.) If the lubricant purchases are greater than 4000 gallons per year using a rolling 12-month total, then potential particulate emissions shall be reevaluated using material balance calculations based on the increase purchase rate.
  - c.) If the estimated particulate emission rate is less than the 0.05 grains/dscf limit, then the facility shall maintain records of the increased purchase rate and potential particulate emission rate.
  - d.) If the revised particulate emission calculation is greater than the 0.05 grains/dscf emission limit, then you shall inspect the source, initiate corrective action, and restore operation of the emission unit to its normal operation as expeditiously as practicable. The facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and a schedule for compliance.
- 3.) Records shall be maintained to include: (1) a monthly log of lubricant purchases, (2) the rolling 12-month annual total purchases, (3) revised emission calculations (if any), (4) inspection results, and (5) corrective action taken (if any). The records shall be



kept on-site for five years and be made available to the Department upon request.

4.) Based on the results of the on-going compliance monitoring, if the Department determines there may be an exceedance of the 0.05 grains/dscf emission limit, then completion of an EPA Method 5 compliance test may be required.

5.) An exceedance of the 0.05 grains/dscf emissions limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-4: Compliance Certification**  
**Effective between the dates of 10/21/2010 and 10/28/2012**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Replaces Condition(s) 45**

**Item 1-4.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-00005

Process: FUR

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-4.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

1.) Emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).



- 2.) As required by the initial Title V permit, the facility completed a compliance test of the particulate emission rate from furnace #510 on November 15, 2000. The results of the test demonstrated an average particulate emission rate of 0.026 grains/dscf at a melt rate of 1,346 pounds of aluminum per hour.
- 3.) On-going compliance monitoring of the particulate emission limit for the two reverberatory furnaces and aluminum melting operation shall be monitored as follows:
  - a.) Each month the facility shall monitor the total aluminum usage based on purchase records.
  - b.) The aluminum purchases shall not exceed 250 tons per month using a rolling 12-month total. At this purchase rate, the facility should not exceed the melt rate observed during the compliance test and, thus, should remain in compliance with the particulate limit.
- 4.) Records shall be maintained to include a monthly log of aluminum purchases. The records shall be kept on-site for five years and be made available to the Department upon request.
- 5.) Based on the results of the on-going compliance monitoring, if the Department determines there may be an exceedance of the 0.05 grains/dscf emission limit, then completion of an EPA Method 5 compliance test may be required.
- 6.) An exceedance of the 0.05 grains/dscf emissions limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.05 grains per dscf  
Reference Test Method: EPA Method 5  
Monitoring Frequency: DAILY  
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 46: Compliance Certification**  
**Effective between the dates of 10/29/2007 and 10/28/2012**



**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 46.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-00006  
Process: HCU

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

**Item 46.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- 1.) Emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).
- 2.) On-going compliance monitoring of the particulate emission limit for the two heat cleaning ovens and associated afterburners shall be monitored as follows:
  - a.) The temperature of the afterburner exhausts shall be measured by in-stack continuous temperature monitoring and recording devices.
  - b.) The temperature monitoring device shall be calibrated annually or in accordance with manufacture specifications.
  - c.) The afterburners shall be in use whenever the ovens are in use. The oven is designed to shutdown whenever the afterburner exhaust temperature drops below 1300 degrees Fahrenheit. The temperature of the afterburner exhaust should operate at 1400 degrees Fahrenheit or greater.
  - d.) Any event when the temperature drops below 1400 degrees Fahrenheit during the heat cycle shall be corrected as follows: you shall inspect the source, initiate corrective action, and restore operation of the emission unit (including the control device and associated capture system) to its normal operation as expeditiously as practicable.
  - e.) If the facility is unable to correct the problem and the temperature measurement remains below 1400 degrees



Fahrenheit, then the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and a schedule for compliance.

3.) Records shall be maintained to include: (1) continuous temperature chart recordings, (2) record of any events where the temperature was below 1400 degrees Fahrenheit during the heat cycle with an explanation of the cause, (3) inspection results (if any), and (4) corrective action taken (if any). The records shall be kept on-site and be made available to the Department upon request.

4.) Based on the results of the on-going compliance monitoring, if the Department determines there may be an exceedance of the 0.05 grains/dscf emission limit, then completion of an EPA Method 5 compliance test may be required.

5.) An exceedance of the 0.05 grains/dscf emissions limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 47: Capping Monitoring Condition  
Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 47.1:**

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

6 NYCRR 212.10 (a) (2)

6 NYCRR Subpart 231-2

**Item 47.2:**

**New York State Department of Environmental Conservation**

Permit ID: 9-5620-00027/00153

Facility DEC ID: 9562000027



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

**Item 47.3:**

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 47.4:**

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 47.5:**

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 47.6:**

The Compliance Certification activity will be performed for:

Emission Unit: P-00009

Process: SMT

Regulated Contaminant(s):

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

**Item 47.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Prestolite has accepted limitations on Oxides of Nitrogen (NOx) emissions below major source thresholds to avoid applicability to 6NYCRR Part 231-2 - New Source Review and 6NYCRR Part 212-10 - Reasonably Available Control Technology (RACT) for Major Facilities. The emission capping requirements for the NOx emissions are as follows:

- 1.) Oxides of Nitrogen (NOx) emissions from Emission Unit P-00009 are limited to 50 tons per year (tpy) as determined by summing the individual monthly emissions during any consecutive 12 month period.



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

a.) Prestolite shall monitor the time each starter test engine and alternator 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.) On a monthly basis, Prestolite shall compute the annual NOx emission rate using a rolling 12-month period. The monthly and 12 month total emissions shall be recorded in a log and kept on site. This log shall be made available to the Department for review during normal business hours.

3.) An exceedance of the 50 tpy NOx emission limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported as a deviation/violation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 50 tons per year

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 1/30/2008.

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 48: Contaminant List**  
**Effective between the dates of 10/29/2007 and 10/28/2012**

**Applicable State Requirement:ECL 19-0301**

**Item 48.1:**  
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

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



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

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

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

**Condition 1-5: Unavoidable noncompliance and violations**  
**Effective between the dates of 10/21/2010 and 10/28/2012**

**Applicable State Requirement: 6 NYCRR 201-1.4**

**Replaces Condition(s) 49**

**Item 1-5.1:**

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.

(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 1-6: Air pollution prohibited**  
**Effective between the dates of 10/21/2010 and 10/28/2012**

**Applicable State Requirement:6 NYCRR 211.2**

**Replaces Condition(s) 50**

**Item 1-6.1:**

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.

