

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 7-1122-00063/00151

3/5/02 08:46:16



Facility Identification Data

Name: PALL TRINITY MICRO

Address: 3643 NYS ROUTE 281, NW CORNER OF INTERSECTION W/ MCLEAN RD

City: CORTLAND

Zip: 13045

Owner/Firm

Name: PALL CORP

City: GREENVALE

State: NY Country: USA Zip: 11548

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: MICHAEL K. BARYLSKI

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Name: PATRICIA B. STOCK

Address: PALL TRINITY MICRO

3643 NYS ROUTE 281 / PO BOX 2030

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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(2) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that while the permit review report is based on information found in the accompanying permit, it is not an enforceable document and therefore, has no legal standing.

Summary Description of Proposed Project

This permit fulfills the requirement for this major stationary source to obtain a Title V permit.

Attainment Status

PALL TRINITY MICRO is located in the town of CORTLANDVILLE in the county of CORTLAND.

The attainment status for this location is provided below. (Areas classified as attainment

are those that meet all ambient air quality standards for a designated criteria

air pollutant.)

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Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone* (NON-ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

Pall Trinity Micro (PTM) manufactures disposable and cleanable filter elements, filtration systems, filter housings, and metal filter media. Many operations are performed including filter bubble point testing, metal forming, development and testing of filters and manufacturing technologies, filter drying, filter part QA/QC testing, filter forward flow testing, hydrostatic testing, metal filter parts or media surface preparation, metal media forming, metal sheet and mesh coating, sintering, solvent extraction, and welding

The facility is comprised of two major buildings. Both buildings have space devoted to offices; support services; laboratory operations; research and development (R&D) operations; and manufacturing operations. The buildings recently had name changes. Pall Cortland North was formerly known as the PED building. Pall Cortland Main was formerly known as the PTM building. Several divisions are located at the site including Pall Trinity Micro (PTM), which is manufacturing; SLS, which is laboratory operations; and R&D.

Operation Descriptions

Filter bubble point testing: Filters are immersed in alcohol, plugged and tested for quality with air pressure

Metal forming: Metal sheets and bar stock are shaped into filter parts and filter system components

Development and testing of filters and manufacturing technologies: Proprietary R&D activities

Filter drying: Filters wetted with alcohol and/or water are dried in a warm atmosphere

Filter part QA/QC testing: Metal parts are test to ensure proper standards in construction and material are met

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Filter forward flow testing: Filters are infused with alcohol to test for quality

Hydrostatic testing: Water is used to test the integrity of filter systems

Metal filter parts or media surface preparation: Metal surfaces have the carbon removed using an acid bath

Metal media laydown: Metal fibers/powders are prepared and put on screens/forms for the manufacture of media

Metal mesh coating The application of leafing aluminum paste to screens used in sintering

Metal sheet coating: A silica or alumina slurry is applied to metal sheets used to separate media during manufacturing

Solvent Extraction: A solvent (methylene chloride) is used to carry off soluble matter trapped in the filters; a cleaning process.

Sintering: Metal particles are brought to just below their melting point, softening and fusing them together to form a solid sheet

Welding: Handheld and automatic TiG and MiG welding

Permit Structure and Description of Operations

The Title V permit for PALL TRINITY MICRO is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

combustion - devices which burn fuel to generate heat, steam or power

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incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

PALL TRINITY MICRO is defined by the following emission unit(s):

Emission unit PUNITA - This emission unit includes all manufacturing processes at the facility.

Emission unit PUNITA is associated with the following emission points (EP):

PA008, PA010, PA039, PA040, PA042, PA043, PA044, PA046, PA050, PA098, PA099, PA105, PA148, PA149, PA206, PA207, PA208, PA220, PA235, PA236, PA242, PA244, PA248, PA253, PA254, PA255, PA256, PA257, PA261, PA262, PA272, PA283, PA286, PA288, PA507, PA509, PA523, PA524, PA526, PA530, PA534, PA536, PA537, PA541, PA558, PA651, PA697, PA698, PA699, PA700, PA701, PA702, PA709

It is further defined by the following process(es):

Process: M22 is located at Building PC MAIN - This process includes the primary sources of bubble point and drying operations at the facility. Grouping facilitates record keeping, because all sources are in one business unit (10) and use a single chemical (Filmex).

Process: M24 is located at Building PC MAIN - This process includes bubble point and drying operations. Grouping facilitates record keeping, because all sources are in one department (10W) and use a single chemical (Filmex).

Process: M25 is located at Building PC MAIN - This process includes filter system assembly including metal forming, welding, hydrostatic testing, filter bubble point testing, filter drying, metal filter parts surface preparation, and filter part QA/QC testing. Grouping facilitates record keeping, because all sources are in one business unit and in one building.

Process: M26 is located at Building PC MAIN - This process includes filter bubble point testing, filter drying, metal media laydown, sintering, drying, metal sheet coating, and metal mesh coating.

Process: M27 is located at Building PC MAIN - This process includes forward flow and filter bubble point testing operations in the 10S production area. Grouping facilitates record keeping, because all sources are in one department and use a single chemical (Pallsol).

Process: M33 is located at Building PC MAIN - This process includes filter assembly surface coating operations.

Process: M55 is located at Building PC M, N - Process operations include metal filter parts surface preparation. Grouping facilitates recordkeeping, because chemicals used are acids (all non-VOC).

Process: M56 is located at Building PC MAIN - Process operations include the recovery system for the filter solvent extraction method that uses methylene chloride. Grouping facilitates recordkeeping because a single chemical is used (methylene chloride) and has a single emission point.

Title V/Major Source Status

PALL TRINITY MICRO is subject to Title V requirements. This determination is based on the following information:

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This facility is major for VOC emissions.

Program Applicability

The following chart summarizes the applicability of PALL TRINITY MICRO with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated

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industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

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SIC Code 3569	Description GEN INDUSTRIAL MACHINERY, NEC
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SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code 3-99-999-89	Description MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES OTHER NOT CLASSIFIED
4-02-001-01	SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Paint: Solvent-Base

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER(HAP)	> 0	but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL(HAP)	> 0	but < 10 tpy
007440-38-2	ARSENIC(HAP)	> 0	but < 10 tpy
000071-43-2	BENZENE(HAP)	> 0	but < 10 tpy
007440-43-9	CADMIUM(HAP)	> 0	but < 10 tpy

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000630-08-0	CARBON MONOXIDE	> 0 but < 2.5 tpy
007440-47-3	CHROMIUM(HAP)	> 0 but < 10 tpy
007440-48-4	COBALT(HAP)	> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE(HAP)	>= 10 tpy
000100-41-4	ETHYLBENZENE(HAP)	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE(HAP)	> 0 but < 10 tpy
0NY100-00-0	HAP	>= 10 tpy but < 25 tpy
000110-54-3	HEXANE(HAP)	> 0 but < 10 tpy
007439-92-1	LEAD(HAP)	> 0 but < 10 tpy
007439-96-5	MANGANESE(HAP)	> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL(HAP)	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE(HAP)	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE(HAP)	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS(HAP)	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES	> 0 but < 2.5 tpy
0NY075-00-5	PM-10	> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE	> 0 but < 2.5 tpy
000108-88-3	TOLUENE(HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 100 tpy but < 250 tpy
001330-20-7	XYLENE, M, O & P MIXT.(HAP)	> 0 but < 10 tpy

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	40CFR 82-F.	Protection of Stratospheric Ozone - recycling and emissions reduction	38
FACILITY	6NYCRR 200.5	Sealing.	1
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	2
FACILITY	6NYCRR 200.7	Maintenance of equipment.	3
FACILITY	6NYCRR 201-1.10(b)	Permitting - public access to records kept for Title V permitting	8
FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	4
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	51
FACILITY	6NYCRR 201-1.5	Emergency defense	5
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	6
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	7
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	9
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	10
FACILITY	6NYCRR 201-5.	State Facility Permit General Provisions	52, 53
FACILITY	6NYCRR 201-5.3(b)	Permit Content and Terms of Issuance - permit conditions	54
FACILITY	6NYCRR 201-6.	Title V Permits and the Associated Permit Conditions	21, 22, 23, 39, 40, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20

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FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	24
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	25
FACILITY	6NYCRR 201-6.5(f)(2)	Protocol	26
FACILITY	6NYCRR 201-6.5(g)	Permit shield	27
FACILITY	6NYCRR 202-1.1	Required emissions tests.	28
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	29
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	30
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	55
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	31
FACILITY	6NYCRR 212.10(c)(4)(iii)	General Process Emission Sources - NOx and VOC RACT required at major facilities	33, 34, 32, 35, 36
P-UNITA	6NYCRR 212.10(c)(4)(iii)	General Process Emission Sources - NOx and VOC RACT required at major facilities	41
P-UNITA/-/M22	6NYCRR 212.10(c)(4)(iii)	General Process Emission Sources - NOx and VOC RACT required at major facilities	42
P-UNITA/-/M55	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or modifications	56
P-UNITA/-/M56	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or modifications	57
P-UNITA/-/M33	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	43
FACILITY	6NYCRR 215.	Open Fires	37
P-UNITA/-/M33	6NYCRR 228.1(h)(13)	Specialty coating exemption	44
P-UNITA/-/M33	6NYCRR 228.10	No open containers	50
P-UNITA/-/M33	6NYCRR 228.2	Definitions.	45
P-UNITA/-/M33	6NYCRR 228.3(a)	compliant coatings or controls	46
P-UNITA/-/M33	6NYCRR 228.4	Opacity.	47
P-UNITA/-/M33	6NYCRR 228.5(a)	recordkeeping	48
P-UNITA/-/M33	6NYCRR 228.7	Table 1	49

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

6NYCRR Part 200-.6

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Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.2

Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.5

An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating properly at the time, the person responsible took all reasonable steps to minimize the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected contaminants to the air

6NYCRR Part 201-1.10(b)

Any permit application, compliance plan, permit, and monitoring and compliance certification report that is submitted as part of the Title V permit process must be made available to the public as per requirements set forth under 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the Clean Air Act Amendments of 1990.

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6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial 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.

6NYCRR Part 201-5

General Provisions - this requirement applies to those permit terms and conditions which are not federally enforceable; specifies that permittees must maintain emission units and control devices in compliance with all rules; authorizes reasonable access for inspections for department representatives; requires that on-site monitoring recordkeeping be made available for review for at least 5 years.

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the state-only portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

6NYCRR Part 201-6

General provisions for Title V permits including:

Applicable Criteria, Limits, Terms, Conditions and Standards - requires that facility operations take place in accordance with approved criteria, emission limits, terms, conditions and standards as specified in the permit and that any documents required by the federally enforceable portion of the permit be certified by a responsible official

Cessation or Reduction of Permitted Activity Not a Defense - specifies that the cessation or reduction of a permitted activity to maintain compliance is not a defense in an enforcement action

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Compliance Requirements - lists the information that must be included in any required compliance monitoring records and reports; and requires; compliance with any approved compliance schedule; the submittal of risk management plans as per 112(r) of the Act if necessary; and the submittal of compliance progress reports on a semiannual basis, at a minimum

Federally-Enforceable Requirements - specifies what permit terms and conditions, in general, are federally enforceable

Fees - requires the permittee to pay any required fees

Monitoring, Related Recordkeeping and Reporting Requirements - requires all compliance monitoring and recordkeeping to be conducted according to the terms and conditions of the permit and any Q/A requirements; any monitoring or support information is to be retained for minimum of 5 years.

Permit Revocation, Modification, Reopening, Reissuance or Termination and Associated Information Submission Requirements - specifies that the permit may be modified, revoked, reopened and reissued, or terminated for cause; and the permittee must furnish information regarding the permit to the department upon reasonable request

Permit Shield - sets forth criteria under which the permit shield applies and what authority the department maintains in pursuing violations

Property Rights - specifies that the permit does not convey any property rights

Reopening Cause - sets forth criteria and procedures for reopening a permit

Right to Inspect - establishes authority whereby department representatives may enter and inspect a facility

Severability - establishes that the permit continues to be valid in instances where any provisions, parts or conditions of the permit are found to be invalid or are the subject of a challenge

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1

Specifies that emissions tests may be required to ascertain compliance with any air

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pollution codes and rules.

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

Specifies the emission statement records that must be maintained for a 5 year period.

6NYCRR Part 211-.2

General air pollution prohibition

6 NYCRR Part 211.3

Restricts the opacity of visible emissions from any air contamination source.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 82, Subpart F

Requires affected permittees to comply with the recycling and emissions reduction standards specified by this rule when using ozone depleting substances identified under Title VI of the Act. Specifically, these regulations apply to the following persons or activities:

- a. Persons opening appliances for maintenance, service, repair, or disposal
- b. Equipment used during the maintenance, service, repair, or disposal of appliances
- c. Persons performing maintenance, service, repair, or disposal of appliances
- d. Persons disposing of small appliances, motor vehicle air conditioners or MVAC's, and MVAC-like appliances
- e. Persons owning commercial or industrial process refrigeration equipment
- f. Owners/operators of appliances normally containing 50 or more pounds.

If applicable, the above persons or activities may be required to comply with certain disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, PALL TRINITY MICRO has been determined to be subject to the following regulations:

6NYCRR 201-6.5 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions

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regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5 (f) (2)

This regulation defines, in general terms, the protocol component of the operational flexibility provisions. Protocols are to specify how proposed compliance changes are to be evaluated with respect to applicable requirements and in particular Part 212. This regulation requires the protocol to include provisions for notifying the Department of changes, assessing control requirements, determining compliance with applicable rules and maintaining the source inventory.

6NYCRR 212.10 (c) (4) (iii)

This rule allows those sources which cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the department.

6NYCRR 212.4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6NYCRR 212.4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 228.1 (h) (13)

This section includes the provisions allowing specialty coating usage, totalling less than 55 gallons per year, to be exempt from Part 228.

6NYCRR 228.10

The requirements for handling, storage, and disposal of VOCs are provided in this section.

6NYCRR 228.2

This reference provides definitions for the important terms used in this rule.

6NYCRR 228.3 (a)

This reference provides the three options that can be used to control VOC emissions from a surface coating process. The three options are to use a compliant coating (i.e., one that does not exceed the allowable VOC content), the use of a coating system, or the use of air pollution control equipment.

6NYCRR 228.4

This reference requires the opacity of the emissions from a facility, with surface coating processes subject to this rule, to be less than 20 % during any consecutive six minute period. Opacity limits are used

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primarily to control the quantity of particulates released from a source.

6NYCRR 228 .5 (a)

This reference provides the recordkeeping requirements for emission sources subject to this rule. All of these records must be kept for at least five years and provided to the Department upon request.

6NYCRR 228 .7

Table 1 provides a list of surface coating processes and the corresponding allowable VOC content of the coatings used in each process.

Compliance Certification

Summary of monitoring activities at PALL TRINITY MICRO:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	25
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	29
FACILITY	record keeping/maintenance procedures	32
FACILITY	record keeping/maintenance procedures	33
FACILITY	record keeping/maintenance procedures	34
FACILITY	record keeping/maintenance procedures	35
FACILITY	record keeping/maintenance procedures	36
P-UNITA	work practice involving specific operations	41
P-UNITA/-/M22	work practice involving specific operations	42
P-UNITA/-/M33	intermittent emission testing	43
P-UNITA/-/M33	record keeping/maintenance procedures	44
P-UNITA/-/M33	record keeping/maintenance procedures	45
P-UNITA/-/M33	monitoring of process or control device parameters as surrogate	47
P-UNITA/-/M33	work practice involving specific operations	49

Basis for Monitoring

Some monitoring requirements contained in this permit are based on specific monitoring requirements listed in each applicable rule. Other monitoring requirements are needed to provide reliable data that are representative of the source's compliance status as per 6NYCRR Part 201-6.5(b)(2) (periodic monitoring).