



Facility Identification Data

Name: CUMMINS INC - JAMESTOWN ENGINE PLANT
Address: 4720 BAKER ST EXT
LAKEWOOD, NY 14750

Owner/Firm

Name: CUMMINS INC
Address: 4720 BAKER ST EXT
LAKEWOOD, NY 14750-9762, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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LAKEWOOD, NY 14750-9766
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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)(5) 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 this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Attainment Status

CUMMINS INC - JAMESTOWN ENGINE PLANT is located in the town of BUSTI in the county of CHAUTAUQUA.

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.)

Criteria Pollutant

Attainment Status



Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10 μ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	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

THE CUMMINS JAMESTOWN ENGINE PLANT MANUFACTURES, ASSEMBLES, AND PAINTS DIESEL ENGINES. THE PLANT INCLUDES ONE MANUFACTURING BUILDING AND A SMALL WASTEWATER TREATMENT SUPPORT BUILDING.

Permit Structure and Description of Operations

The Title V permit for CUMMINS INC - JAMESTOWN ENGINE PLANT 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
- 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.

CUMMINS INC - JAMESTOWN ENGINE PLANT is defined by the following emission unit(s):



Emission unit 1ENGTC - Emission Unit 1-ENGTC encompasses the emissions of combustion products from the diesel engines tested in the test cells at the facility. This emission unit includes 12 emission points and three processes as follows:

- 1.) Research Engine Test Cells - (Process E01, including Emission Sources TC001 through TC006 plus TC008 and corresponding emission points 00101 through 00106 plus 00108).
- 2.) Production Test Cells - (Process E02, including Emission Sources TC009 through TC016 and corresponding emission points 00110 through 00116).
- 3.) Diesel Storage - (Process E03, including Emission Sources TK002 and TK003 and corresponding emission points 00208 and 00209).

Previously permitted test cell TC007 (emission points 00107), as well as the CAM trailer and Cold Start Test Cell, are exempt under 6NYCRR 201-3.2(c)(43) as research and development activities.

Emission unit 1ENGTC is associated with the following emission points (EP): 00101, 00102, 00103, 00104, 00105, 00106, 00108, 00109, 00121, 00122, 00124, 00125, 00127, 00208, 00209
It is further defined by the following process(es):

Process: E01 is located at GROUND, Building MAIN - THIS PROCESS INCLUDES DIESEL ENGINES TESTED IN THE RESEARCH ENGINE TEST CELLS. THE PROCESS INCLUDES SEVEN EMISSION SOURCES (TC001 THROUGH TC006 AND TC008) AND THEIR CORRESPONDING DEDICATED STACKS (EMISSION POINTS 00101 THROUGH 00106 AND 00108).

Process: E02 is located at GROUND, Building MAIN - THIS PROCESS INCLUDES DIESEL ENGINES TESTED IN THE PRODUCTION TEST CELLS. THE PROCESS INCLUDES SEVEN COMBUSTION EMISSION SOURCES (TC010 THROUGH TC016), THEIR CORRESPONDING DEDICATED AFTERBURNERS (JOHNSON FLARES) FOR SMOKE CONTROL (EMISSION SOURCES JF010 THROUGH JF016), AND THEIR CORRESPONDING DEDICATED STACKS (EMISSION POINTS 00110 THROUGH 00116). JOHNSON FLARES CONTROL SMOKE PRODUCED FROM PETROLEUM JELLY USED TO SEAL THE ENGINES FOR TESTING.

Process: E03 THIS PROCESS INCLUDES THE STORAGE OF DIESEL FUEL IN TWO ABOVEGROUND TANKS. THIS FUEL IS PRIMARILY USED FOR ENGINE TESTING.

Process: E04 is located at Building MAIN - Process E04 includes completing a "final test" or "no load" test on engines that have already been painted and tested in a production test cell. The "no load" tests are performed on fully assembled engines (except for fan blades) complete with a generator, compressor, etc and ready for shipping.

Emission unit 2PAINT - THE CURRENT PAINT SYSTEM AT THE CUMMINS JAMESTOWN ENGINE PLANT (JEP), INSTALLED IN 1997 UNDER THE PROVISIONS OF ASF PERMIT #9-0622-00003/00067, INCLUDES ONE LARGE MAIN PAINT SPRAY BOOTH, A SMALL MANUAL PAINT SPRAY BOOTH, TWO PAINT DRY OVENS AND A FLASH TUNNEL. THE EMISSION UNIT INCLUDES FOUR EMISSION POINTS: ONE FOR EACH DRYING OVEN, ONE FOR THE PAINT BOOTHS, AND ONE FOR THE FLASH TUNNEL. THE PAINT SYSTEM IS USED TO APPLY PAINT TO DIESEL ENGINES MANUFACTURED AT THE PLANT. THIS EMISSION UNIT HAS A PTE OF GREATER THAN 10 TPY VOC AND IS DESCRIBED IN TABLE 1 OF 6NYCRR PART 228; THEREFORE, IT IS SUBJECT TO THE VOC RACT LIMITATIONS OF THAT REGULATION. WHEN THE CURRENT PAINT SYSTEM WAS INSTALLED THE EMISSION UNIT WAS CAPPED AT 47.9 TPY VOC TO MAINTAIN PROJECT PTE AT LESS THAN THE 40 TPY APPLICABILITY THRESHOLD OF 6NYCRR PART 231-2.

Emission unit 2PAINT is associated with the following emission points (EP): 00020, 00023, 00024, 00025

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

Process: P01 is located at COLUMN S3, Building MAIN - THIS PAINTING PROCESS INCLUDES THE ENTIRE EMISSION UNIT 2-PAINT. PAINT IS APPLIED TO THE ENGINES MANUALLY BY OPERATORS USING SPRAY GUNS. UP TO 10 DIFFERENT COLOR PAINTS ARE APPLIED TO THE ENGINES.



PARTICULATES ARE CONTROLLED BY FILTERS. THE PAINT BOOTH SYSTEM INCLUDES ONE LARGE CONVEYORIZED PAINT BOOTH (EMISSION SOURCE PB007) IN WHICH THE ENGINES ARE PAINTED. EXHAUST FROM THE LARGE PAINT BOOTH PASSES THROUGH A FILTER (EMISSION SOURCE FL003) AND IS DIRECTED TO ONE STACK (EP00023). APPROXIMATELY 80% OF VOLATILE ORGANICS AND 100% OF PARTICULATES FROM THIS PROCESS ARE EMITTED OUT EP00023. EXHAUST AIR FROM THE SMALLER MANUAL BOOTH (EMISSION SOURCE PB006) PASSES THROUGH A FILTER (EMISSION SOURCE FL002) AND IS USED AS MAKE UP AIR FOR THE LARGE PAINT BOOTH. THE ENGINES ARE DIRECTED TO A FLASH TUNNEL (EMISSION SOURCE FT001/EP00024) AND TWO DRYING OVENS (DRYING OVEN VN002/EP00020 AND TOP COAT OVEN VN001/EP00025) AFTER THE PAINT BOOTHS. AN ESTIMATED 10% OF VOCs FROM THIS PROCESS ARE EMITTED FROM EP00024. AN ESTIMATED 5% AND 5% OF VOLATILE ORGANICS FROM THIS PROCESS ARE EMITTED FROM EP00020 AND EP00025, RESPECTIVELY.

Emission unit 3MANUF - THIS EMISSION UNIT INCLUDES EMISSION SOURCES ASSOCIATED WITH THE MANUFACTURING LINES AT THE PLANT. THE ACTIVITIES INCLUDED IN THIS EMISSION UNIT ARE WET AND DRY MACHINING, GRINDING, CLEANING, AND HEAT TREATING OPERATIONS OF PRIMARILY, BUT NOT LIMITED TO, CAST IRON, STEEL AND ALUMINUM DIESEL ENGINE PARTS. THE NINE PROCESSES WHICH DIRECTLY DISCHARGE TO THE ENVIRONMENT THROUGH EMISSION POINTS ARE DEFINED ACCORDING TO MANUFACTURING LINES: 312 - CAMBOX MANUFACTURING; 318 - FLYWHEEL MANUFACTURING LINE; 501 - ROD LINE MANUFACTURING LINE; 503 - BLOCK LINE MANUFACTURING LINE; 511 - CAMSHAFT MANUFACTURING LINE; 514 - CRANKSHAFT MANUFACTURING LINE; 515 - HEAD LINE MANUFACTURING LINE; 571 - AHD CAMLINE MANUFACTURING LINE; M01 - MISCELLANEOUS MACHINE WASHERS.

Emission unit 3MANUF is associated with the following emission points (EP):

00012, 00027, 00030, 00031, 00032, 00033, 00036, 00037, 00040, 00041, 00042, 00043, 00044, 00045, 00048, 00049, 00051, 00052, 00053, 00055, 00058, 00060, 00061, 00062, 00063, 00064, 00065, 00066, 00067, 00068, 00076, 00077

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

Process: 318 is located at Building MAIN - PROCESS 318 IS THE FLYWHEEL MANUFACTURING LINE. THIS PROCESS INCLUDES EMISSIONS GENERATED FROM MACHINING (EMISSION SOURCE MC013) IN THE DRY CAST MANUFACTURING. EMISSIONS ARE CONTROLLED WITH A HIGH EFFICIENCY FILTER (EMISSION SOURCE FL004). EMISSIONS ARE EXHAUSTED THROUGH EMISSION POINT 00027.

Process: 501 is located at Building MAIN - THE 501 PROCESS IS THE ROD LINE MANUFACTURING LINE. THIS PROCESS INCLUDES THREE ROD LINE MACHINING OPERATIONS AND THREE ASSOCIATED MIST COLLECTORS. THE CONN. ROD BROACHING OPERATION IS EMISSION SOURCE PR013, WITH MIST COLLECTOR EMISSION SOURCE FL012 (EMISSION POINT 00051). THE CONN. ROD TRANSFER LINE GUN DRILL PROCESS OPERATION IS EMISSION SOURCE PR014, WITH MIST COLLECTOR EMISSION SOURCE FL013 (EMISSION POINT 00052). THE CONN. ROD ALFING GRINDERS ARE EMISSION SOURCE MC015, WITH MIST COLLECTOR EMISSION SOURCE FL014 (EMISSION POINT 00053).

Process: 503 is located at Building MAIN - THE 503 PROCESS IS THE BLOCK LINE MANUFACTURING LINE. THIS PROCESS INCLUDES NINE MACHINING UNITS (EIGHT ROUGH END MACHINES AND ONE FINISH END MACHINE) AND FIVE ASSOCIATED HIGH-EFFICIENCY FARR-TENKAY DUST COLLECTORS. EMISSION SOURCES MC001 AND MC002 ARE CONTROLLED BY DUST COLLECTOR FL005 (EMISSION POINT 00040); MC003 AND MC004 BY FLOO6 (EMISSION POINT 00041); MC005 AND MC006 BY FL007 (EMISSION POINT 00042); MC007 AND MC008 BY FL008 (EMISSION POINT 00043); AND MC009 BY FL009 (EMISSION POINT 00049).

Process: 511 is located at Building MAIN - THE 511 PROCESS IS THE CAMSHAFT MANUFACTURING LINE. THIS PROCESS INCLUDES ONE NATURAL GAS-FIRED HEATER (CAM LINE DRAW OVEN BURNER - EMISSION SOURCE VN008/EMISSION POINT 00076), ONE COOLING DOWN SECTION (EMISSION SOURCE VN009/EMISSION POINT 00077), AN ACID ETCH (EMISSION SOURCE PR005/EMISSION POINT 00055), THREE IPE HARDENERS (ES PR001/EP 00036, ES PR002/EP00037, ES



PR004/EP00058), AND A MACHINING OPERATION (ES PR011) AND ASSOCIATED MIST COLLECTOR (ES FL015/EP00081).

Process: 514 is located at Building MAIN - THE 514 PROCESS IS THE CRANKSHAFT MANUFACTURING LINE. THIS PROCESS INCLUDES THREE EMISSION SOURCES, EACH HAVING A DEDICATED EMISSION POINT: TWO NATURAL GAS-FIRED LANGLEY DRAW FURNACES WITH RATED CAPABILITIES OF 2.6MM BTU/HR (ES VN004/EP00032 AND ES VN005/EP00033) AND A DRAW OVEN COOL DOWN SECTION (ES VN003/EP00031). THE FURNACES ARE USED TO TREAT CRANKSHAFT PARTS. NO CONTROL EQUIPMENT IS ASSOCIATED WITH THIS PROCESS. SOME EMISSIONS OCCUR ASSOCIATED WITH MATERIALS USED FOR CLEANING OF PRODUCTS PRIOR TO ENTERING THE OVENS.

Process: 515 is located at Building MAIN - THE 515 PROCESS IS THE HEAD LINE MANUFACTURING LINE. THIS PROCESS INCLUDES TWO LINE MACHINING OPERATIONS (EMISSION SOURCES MC010 AND MC011) AND TWO ASSOCIATED HIGH-EFFICIENCY FARR-TENKAY DUST COLLECTORS (ES FL010/EP00044 AND ES FL011/EP00045, RESPECTIVELY).

Process: 516 is located at Building MAIN - Process 516 is the AHD camline manufacturing line. This process includes two machining operations (ES MC012 and MC014) (with associated mist collector (ES FL017/EP00060 and ES FL018/EP00064, respectively), an acid etch (ES PR009/EP00062), one heat treat process (ES PR007/EP00067), two hardeners (ES PR006/EP00063 and ES PR008/EP00068) and one draw oven (ES VN006/EP00065) and draw oven cooldown (ES VN007/EP00066).

Process: M01 is located at Building MAIN - THIS PROCESS INCLUDES MISCELLANEOUS MACHINE WASHERS AT THE PLANT. THESE WASHERS UTILIZE WATER-BASED CLEANERS TO CLEAN AND DEGREASE ENGINE PARTS. THEY ARE IDENTIFIED AS FOLLOWS:

ES WS001/EP00005 - CB/CF OP340 WASHER (CENTRI-SPRAY WET BLAST DEBURRING OF INJECTOR & VALVE LINERS) (AT H-21)

ES WS002/EP00008 - LINER WASHER (RANSOHOFF) (AT F-18)

ES WS003/EP00009 - LINER RP (RANSOHOFF) (AT G-19)

ES WS004/EP00010 - ACC WASHER (LUBE PUMP) (AT C-26)

ES WS005/EP00011 - PARTS WASHER (AT E-19)

ES WS006/EP00012 - PISTON WASHER (AT C-4)

ES WS007/EP00030 - CRANK WASHER (AT G-5)

ES WS008/EP00034 - CB/CF OP440 WASHER (AT G-23)

ES WS009/EP00048 - ROD LINE ELAN WASHER (AT S-30)

ES WS010/EP00061 - AHD CAM LINE FINISH WASHER (AT M-4)

Emission unit 4WASTE - THIS EMISSION UNIT INCLUDES WASTE WATER PRE-TREATMENT OPERATIONS AT THE PLANT. AN ULTRAFILTRATION WASTE TREATMENT PROCESS (EMISSION SOURCE PR010) VENTS THROUGH A SOIL BIOFILTER (ES FL016/EP00201) FOR ODOR CONTROL. TWO AERATION TANKS (ES TK001) WHICH DISCHARGE DIRECTLY TO THE ENVIRONMENT ARE ALSO INCLUDED.

Emission unit 4WASTE is associated with the following emission points (EP):
00201

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

Process: W01 is located at Building WTB - THE W01 PROCESS INCLUDES WASTEWATER TREATMENT OPERATIONS AT THE FACILITY. THIS PROCESS INCLUDES WASTEWATER STORAGE (EMISSION SOURCE TK001) AND TREATMENT (EMISSION SOURCE PR010) TANKS AND ASSOCIATED ODOR CONTROL FILTER (ES FL016/EP00201).

Emission unit 5HEATG - THIS EMISSION UNIT IS A FACILITY-WIDE ACTIVITY INCORPORATING ALL



HEATING AND STEAM GENERATION AT THE FACILITY. THE PRIMARY EMISSION POINTS ARE THREE NATURAL GAS-FIRED BOILERS (ES BR001/EP00001, ES BR002/EP00003, AND ES BR003/EP00004), EACH RATED AT 25.11 MMBtu/HR. THESE UNITS ARE PRIMARILY FIRED ON NATURAL GAS BUT ALSO HAVE CAPABILITY TO BURN NO. 2 FUEL OIL. THE FACILITY ALSO HAS SEVERAL NATURAL GAS FIRED HEATING UNITS, ALL RATED AT LESS THAN 10 MMBtu/HR. BECAUSE THE FACILITY EMISSIONS OF NOX ARE GREATER THAN THE 100 TPY THRESHOLD, THE BOILERS ARE SUBJECT TO THE SMALL BOILER REQUIREMENTS OF 6NYCRR 227-2 NOX RACT. Emission unit 5HEATG is associated with the following emission points (EP):

00001, 00003, 00004

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

Process: R01 is located at Building MAIN - THE R01 PROCESS INCLUDES THREE BOILERS USED TO CREATE HEAT AND STEAM FOR THE FACILITY. THE BOILERS CAN BURN EITHER NATURAL GAS OR NO. 2 FUEL OIL. EACH BOILER HAS A RATED CAPACITY OF 25.11 MM BTU/HR. PROCESS R01 IS FOR THE COMBUSTION OF NATURAL GAS AS THE PRIMARY FUEL SOURCE.

Process: R02 is located at Building MAIN - THE R02 PROCESS INCLUDES THREE BOILERS USED TO CREATE HEAT AND STEAM FOR THE FACILITY. THE BOILERS CAN BURN EITHER NATURAL GAS OR NO. 2 FUEL OIL. EACH BOILER HAS A RATED CAPACITY OF 25.11 MM BTU/HR. PROCESS R02 IS FOR THE COMBUSTION OF NO. 2 FUEL OIL AS A BACKUP FUEL SOURCE.

Title V/Major Source Status

CUMMINS INC - JAMESTOWN ENGINE PLANT is subject to Title V requirements. This determination is based on the following information:

The air pollution sources at Cummins Engine emit air pollutants consisting mainly of volatile organic compounds (VOCs), hazardous air pollutants (HAPs), particulate matter, and combustion emissions such as nitrogen oxides (NOx) and sulfur dioxide (SO2).

Cummins Engine is a major source of VOC emissions since its potential to emit (PTE) VOCs is greater than the threshold value of 50 ton per year (tpy). VOC emissions are primarily generated from the surface coating operations and are reduced by using compliant coatings.

The NOx emissions at the facility are greater than the major facility threshold of 100 tpy. The NOx emissions are produced primarily by combustion of diesel fuel in the engine test cells. There are no NOx controls on the test cells.

Actual particulate emissions from the facility are less than 100 tpy. Cummins Engine uses particulate control equipment to reduce emissions from the manufacturing and surface coating operations.

Cummins Engine has accepted certain permit limits on VOC, total HAP, individual HAPs and SO2 emissions.

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.

SIC Code	Description
3519	INTERNAL COMBUSTION ENGINES

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	Description
1-03-005-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
2-02-001-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
2-02-001-06	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) RECIPROCATING: EVAPORATIVE LOSSES (FUEL STORAGE AND DELIVERY SYSTEM)
3-04-022-01	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - METAL HEAT TREATING Furnace: General
3-09-030-04	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - MACHINING OPERATIONS SPECIFY MATERIA**
3-09-030-07	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - MACHINING OPERATIONS FABRICATED METALS-MACHINE OPERATIONS-LUBRICATION-SPECIFY MATERIAL
3-09-825-99	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - WASTEWATER, POINTS OF GENERATION WASTEWATER: SPECIFY POINT OF GENERATION
4-02-025-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Coating Operation
4-02-025-02	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Cleaning/Pretreatment

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		Range	
		lbs/yr			
007440-36-0	ANTIMONY	45000		Y	
000630-08-0	CARBON MONOXIDE	490000		F	
000075-45-6	CHLORODIFLUORO-METHANE		19000		A
061789-51-3	COBALT NAPHTHA	pteyear		Y	
000075-71-8	DICHLORODIFLUOROMETHANE		pteyear		A
000811-97-2	ETHANE, 1,1,1,2-TETRAFLUORO		pteyear		A
000111-76-2	ETHANOL, 2-BUTOXY-	pteyear		C	
000100-41-4	ETHYLBENZENE	pteyear		Y	
000050-00-0	FORMALDEHYDE	pteyear		Y	
0NY100-00-0	HAP	pteyear			
000822-06-0	HEXANE, 1,6-DIISOCYANATO-	pteyear		Y	
007647-01-0	HYDROGEN CHLORIDE	pteyear		Y	
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS			pteyear	Y
007697-37-2	NITRIC ACID	pteyear		A	
0NY090-00-0	OIL MIST	pteyear		C	
0NY210-00-0	OXIDES OF NITROGEN	pteyear		H	
0NY075-00-0	PARTICULATES	pteyear		G	
0NY075-00-5	PM-10	pteyear		G	
007446-09-5	SULFUR DIOXIDE	pteyear			
000108-88-3	TOLUENE	pteyear		Y	
0NY998-00-0	VOC	pteyear		F	
001330-20-7	XYLENE, M, O & P MIXT.	pteyear			



NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event 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 - 6NYCRR Part 201-1.10(b)

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

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

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

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

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state



that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

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

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

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

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

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

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

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

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

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

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



abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or 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 Part 201-6.5(i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits 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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY			
	Powers and Duties of the		Department with respect to air pollution control
FACILITY	40CFR 52-A.21		
	Prevention of Significant		Deterioration
1-ENGTC/-/E03	40CFR 60-Kb.116b(a)		
	NSPS for volatile organic		liquid storage vessels- monitoring of operations
1-ENGTC/-/E03	40CFR 60-Kb.116b(b)		
	NSPS for volatile organic		liquid storage vessels- monitoring of operations
FACILITY	40CFR 63-DDDDD		
	Boilers and Process		Heaters NESHAP rule
FACILITY	40CFR 63-MMMM		
	Miscellaneous Metal Parts		Coating
FACILITY	40CFR 63-PPPPP		
FACILITY	40CFR 68		
	Chemical accident		prevention provisions
FACILITY	40CFR 82-F		
	Protection of		Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6		
	Acceptable ambient air		quality.
FACILITY	6NYCRR 200.7		
FACILITY	6NYCRR 201-1.4		
	Unavoidable noncompliance		and violations
FACILITY	6NYCRR 201-1.7		
FACILITY	6NYCRR 201-1.8		
	Prohibition of		reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)		



Exempt Activities - Proof		of eligibility
FACILITY	6NYCRR 201-3.3 (a)	
Trivial Activities -		proof of eligibility
FACILITY	6NYCRR 201-6	
Title V Permits and the		Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	
FACILITY	6NYCRR 201-6.5 (a) (7)	
FACILITY	6NYCRR 201-6.5 (a) (8)	
FACILITY	6NYCRR 201-6.5 (c)	
Permit conditions for		Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	
Permit conditions for		Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3)	
Permit conditions for		Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	
Permit conditions for		Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	
FACILITY	6NYCRR 201-6.5 (e)	
FACILITY	6NYCRR 201-6.5 (f)	
FACILITY	6NYCRR 201-6.5 (f) (6)	
FACILITY	6NYCRR 201-6.5 (g)	
FACILITY	6NYCRR 201-7	
Federally Enforceable		Emissions Caps
2-PAINT	6NYCRR 201-7	
Federally Enforceable		Emissions Caps
FACILITY	6NYCRR 202-1.1	
FACILITY	6NYCRR 202-2.1	
Emission Statements -		

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FACILITY	6NYCRR 202-2.5	Applicability
Emission Statements -		record keeping requirements.
FACILITY	6NYCRR 211.2	
General Prohibitions -		air pollution prohibited.
FACILITY	6NYCRR 211.3	
General Prohibitions -		visible emissions limited
2-PAINT	6NYCRR 212.4(c)	
General Process Emission		Sources - emissions from new processes and/or modifications
3-MANUF	6NYCRR 212.4(c)	
General Process Emission		Sources - emissions from new processes and/or modifications
1-ENGTC/-/E01	6NYCRR 212.6(a)	
General Process Emission		Sources - opacity of emissions limited
1-ENGTC/-/E02	6NYCRR 212.6(a)	
General Process Emission		Sources - opacity of emissions limited
3-MANUF	6NYCRR 212.6(a)	
General Process Emission		Sources - opacity of emissions limited
FACILITY	6NYCRR 215	
5-HEATG	6NYCRR 225-1.2(a)(2)	
Sulfur in Fuel		Limitations Post 12/31/87.
3-MANUF	6NYCRR 226	
SOLVENT METAL CLEANING		PROCESSES
5-HEATG	6NYCRR 227-1.3(a)	
Smoke Emission		Limitations.
5-HEATG	6NYCRR 227-2.4(d)	
RACT for Oxides of		Nitrogen - small boilers.
2-PAINT	6NYCRR 228.10	
Handling, storage and		disposal of VOCs
2-PAINT	6NYCRR 228.4	
2-PAINT	6NYCRR 228.5	



Reports, recordkeeping,
2-PAINT 6NYCRR 228.7 sampling and analysis
2-PAINT 6NYCRR 231-2
New Source Review in
Nonattainment Areas and
Ozone Transport Region

Applicability Discussion:

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

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6

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 201-1.4

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 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

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 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA



requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and 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 Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions 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(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

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 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

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

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

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



This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, CUMMINS INC - JAMESTOWN ENGINE PLANT has been determined to be subject to the following regulations:

40CFR 52-A.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .

40CFR 60-Kb.116b (a)

This is the records retention requirement for all records required by this section.

40CFR 60-Kb.116b (b)



Owners or operators of affected storage tanks with capacities greater than or equal to 10,000 gallons must keep records of the tanks dimensions and an analysis of its capacity for the life of the tank. If the tank's capacity is less than 20,000 gallons, then it is subject to no other provisions of this subpart.

40CFR 63-DDDDD

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

40CFR 63-MMMM

Cummins is not subject to 40 CFR 63 Subpart MMMM - 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.

40CFR 63-PPPPP

Cummins is not subject to 40 CFR 63 Subpart PPPPP - 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.

6NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

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 an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 226

This regulation specifies the general requirements, equipment specifications and operating requirements for open-top vapor, conveyORIZED and cold cleaning degreasers.

6NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-2.4 (d)

This rule specifies that the reasonably available control technology (RACT) requirement for small boilers (< or = 50 million BTUs/hr) at Title V facilities consists of an annual tune-up.

6NYCRR 228 .10



This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6NYCRR 228 .4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6NYCRR 228 .5

Reports, recordkeeping, sampling and analysis of the VOC content of surface coatings.

6NYCRR 228 .7

Table 1 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Compliance Certification

Summary of monitoring activities at CUMMINS INC - JAMESTOWN ENGINE PLANT:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
1-ENGTC/-/E03	36	record keeping/maintenance procedures
1-ENGTC/-/E03	37	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
2-PAINT	38	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
2-PAINT	39	monitoring of process or



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3-MANUF	44	control device parameters as surrogate monitoring of process or control device parameters as surrogate
1-ENGTC/-/E01	34	monitoring of process or control device parameters as surrogate
1-ENGTC/-/E02	35	monitoring of process or control device parameters as surrogate
3-MANUF	45	monitoring of process or control device parameters as surrogate
5-HEATG	47	work practice involving specific operations
3-MANUF	46	record keeping/maintenance procedures
5-HEATG	48	monitoring of process or control device parameters as surrogate
5-HEATG	49	record keeping/maintenance procedures
2-PAINT	43	record keeping/maintenance procedures
2-PAINT	40	monitoring of process or control device parameters as surrogate
2-PAINT	41	record keeping/maintenance procedures
2-PAINT	42	work practice involving specific operations

Basis for Monitoring

APPLICABLE REQUIREMENTS:

6NYCRR Part 201-7 - Federal Enforceable Emission Caps:

Cummins Engine has accepted facility-wide limitations on total HAP and individual HAP emissions below 45,000 pounds per year (lbs/yr) and 19,000 lbs/yr, respectively, 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 PTTTT - NESHAP for Engine Test Cell/Stand. The permit requirements used to demonstrate compliance with the emission limits include monthly emission calculations.

Cummins Engine limits SO2 emissions to less than 250 tons per year (tpy) as determined by summing the individual monthly emissions during any consecutive 12 month period. Cummins has accepted these emission limitations below major source thresholds to avoid applicability to 40 CFR 52 - Prevention of Significant Deterioration. Demonstration of compliance with the emission limit is achieved through monthly emission calculations based on actual fuel usage.

Cummins Engine limits VOC emissions from Emission Unit 2-PAINT to less than 95,800 pounds per year (lbs/yr) in any consecutive rolling 12 month period. This limit was adopted in Air State Facility Permit #9-0622-00003/00067 when the facility applied for a project in 1997 to modify this emission unit from the manner in which it was then configured and operated. The VOC emissions from the project itself were limited to less than 39 tons per year (tpy) as determined by summing the VOC consumption from the project during any consecutive 12 month period. Part 231-2 New Source Review was therefore not required for the project. Actual VOC emissions prior to the change were 8.9 tpy. Total VOC emissions from this emission unit were therefore capped so as not to exceed 47.9 tpy (95,800 lbs/yr). The permit requirements used to demonstrate compliance with the emission limits include monthly emission calculations.

6NYCRR Part 212 - General Process Emission Sources:



Particulate emissions are generated from emission units 1-ENGTC, 2-PAINT and 3-MANUF. The affected sources are subject to an allowable particulate emission rate. Compliance with the particulate emission rate for the engine test cells is demonstrated through a once per permit term performance test. Compliance with this regulation for the paint spray booths is accomplished by using spray booth filters, monthly inspections, and monthly differential pressure measurements. Compliance with the particulate emission rate from the manufacturing processes is completed through monthly inspections and monthly differential pressure measurements of the control equipment.

Emission unit 3-MANUF is subject to an allowable opacity limit. Monthly visible emission observations are completed to demonstrate compliance with this emission limit.

6NYCRR Part 225-1.2 - Fuel Sulfur Limits:

The three boilers shall not use any distillate fuel oil which has a sulfur content greater than 1.5 percent sulfur by weight. Supplier certifications are used to demonstrate compliance with this requirement.

6NYCRR Part 226 - Cold Cleaning Degreasers:

Cold batch cleaning processes used in the manufacturing processes are required to satisfy equipment specifications and operating procedures as specified in 6NYCRR part 226.

6NYCRR Part 227-1 - Stationary Combustion Installations:

Visual emissions from the engine test stands are limited by an opacity limit. White, blue or black smoke may be emitted from the engine exhaust during an engine cold start, idling or low load operation. Compliance with this limit is accomplished through periodic Method 9 opacity observations.

6NYCRR Part 227-2 - Stationary Combustion Installations NOx Emissions:

An annual boiler tune-up is required for the three small boilers at the facility to demonstrate compliance with the Reasonably Available Control Technology (RACT) requirements for NOx emissions. The engine test cells are exempt from the NOx RACT requirements of this regulation.

6NYCRR Part 228 - Surface Coating Processes VOC Emissions:

The surface coating processes are subject to the RACT requirements of 6NYCRR Part 228 for VOC emissions. Compliance with this requirement is maintained through use of compliant coatings having a maximum VOC content of 3.5 pounds per gallon, as applied. Manufacturer certifications are kept on-site to demonstrate compliance. In addition, annual sampling and analysis of two solvent-based coatings are completed to demonstrate continued compliance.

Emission unit 2-PAINT is subject to an allowable opacity limit. Monthly visible emission observations are completed to demonstrate compliance with this emission limit.

40CFR60.116b(b) - NSPS Subpart Kb:

The fuel storage vessels for the engine test cells are required to maintain on-site records showing the dimensions of the storage vessels and an analysis showing the capacity of the storage vessels. The records must be maintained for five years.

NON-APPLICABLE REQUIREMENTS:

40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for

Industrial/Commercial/Institutional Boilers and Process Heaters:

Cummins Engine 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 63 Subpart M - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products:

Cummins Engine 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 63 Subpart P - National Emission Standard for Hazardous Air Pollutants for Engine Test Cell/Stand:

Cummins Engine 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 64 - Compliance Assurance Monitoring:

Cummins does not operate Pollutant Specific Emission Units (PSEU) at a major source that use a control device to achieve compliance with any emission limit or standard. The particulate limit is applicable to each emission point using a control device. The particulate sources which vent to control equipment and through separate emission points do not exceed a pre-control emission rate of 100 tons per year. Therefore, Cummins is not subject to the Compliance Assurance Monitoring (CAM) requirements.

APPLICABLE REGULATIONS NOT INCLUDED:

40CFR 60 Subpart III - Standards of performance for Stationary Compression Ignition Internal Combustion Engines:

Cummins Engine manufactures Stationary Compression Ignition Internal Combustion Engines that are subject to 40CFR60 Subpart III. This regulation is not included in this Title V permit because these engines are tested at a Cummins Engine facility located in the State of Ohio where compliance with this regulation is maintained and monitored.