



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 9-1442-00040/02003  
08/31/2015**

**Facility Identification Data**

Name: MOOG INC  
Address: SENECA ST, JAMISON RD & CONLEY RD  
ELMA, NY 14052-0018

**Owner/Firm**

Name: MOOG INC  
Address: 400 JAMISON RD  
EAST AURORA, NY 14052-0018, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
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Air Permitting Facility Owner Contact:  
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SENECA ST & JAMISON RD  
EAST AURORA, NY 14052  
Phone:7166874476

**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.

**Summary Description of Proposed Project**

In accordance with discussions with the NYSDEC Air Division representatives, a facility tour and re-evaluation of the actual emissions calculation in late 2011, Moog Inc. East Aurora operations is submitting this new application for Title V. Based on these discussions and analysis, we believe the registration status for the East Aurora Jamison and Conley Road buildings is no longer applicable for the VOC usage. We have determined the annual potential to emit exceeds the 50 ton per year VOC limit.



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The facility operations span across about a dozen buildings with hundreds of small sources. The facility needs to operate with lean, six sigma practices, operations need to be moved frequently and new floor layouts created to allow for optimum production efficiency. As part of this permit application we are requesting a RACT variance to comply with the VOC requirements within NYCRR Part 228-1 for Surface Coating Processes, specifically Tables 1 & 2. Details supporting this variance request are supplied within this application.

Additionally, the facility is subject to the following National Emission Standards for Hazardous Air Pollutants (NESHAPs):

- Plating and Polishing Operations (40CFR63 Subpart WWWWWW)
- Paint Stripping and Miscellaneous Surface Coating Operations (40CFR63 Subpart HHHHHH)
- Stationary Reciprocating Internal Combustion Engines (40CFR63 Subpart ZZZZ)

Consequently, we are requesting a Title V permit that allows for operational growth, frequent production floor layout and equipment moves and continued use of the specialized and specification driven chemicals.

**Attainment Status**

MOOG INC is located in the town of ELMA in the county of ERIE.

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 < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL 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:**

Moog Inc. is a worldwide designer, manufacturer, and integrator of precision motion control products and systems. The East Aurora, NY, facility consists of numerous buildings housing operations for three different groups within Moog, Inc. This facility specializes in the design and manufacture of high-performance motion control systems for military and commercial aircraft, satellites and space and defense hardware, industrial machinery, energy industry machinery, marine applications, and medical equipment. This manufacturing facility is dependent on a highly specialized workforce working to individually assemble and test hardware. Technical design drawings, work instructions within each operation result in many stages of production sharing activities such as piece part soldering, applying adhesives, hand polishing, drilling, etc. These activities take place at specially designed stations performed by one or two people. The resulting emissions are typically not directly vented; rather mix with comfort cooling and heating of the process area and return to the building for makeup air. Particulates are captured in HVAC



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filtration systems and any other emissions are minimal since individually actions are done a maximum of 15 to 20 minutes during the work day.

**Permit Structure and Description of Operations**

The Title V permit for MOOG INC

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.

MOOG INC is defined by the following emission unit(s):

Emission unit 000007 - This emission unit consists of a wastewater evaporator used mainly to evaporate wash waters since the facility is not serviced by a municipal sewer system.

Emission unit 000007 is associated with the following emission points (EP):  
00004

Process: 007 Operation of the wastewater evaporator.

Emission unit 000002 - Facility-wide PM & PM-10 emission sources with emissions calculated using the total amount of dust collected from all dust control equipment and cooling towers. Based on this calculation for 2010, the potential PM and PM-10 emitted is calculated to be below 10 tons.

Appendix 1-c: 2010 Facility-wide dust collection equipment emission inventory.

Emission unit 000002 is associated with the following emission points (EP):  
02-47, 17-23, 20-15, 20-16, 24-14

Process: 002 The use of equipment throughout the facility that generate particulate emissions.

Emission unit 000003 - This emission unit is comprised of the facility-wide VOC emissions which come from many small emission sources. Most of these emission sources by themselves could be exempted based on DEC minor source exemption rules (NYCRR Part 201-3.2). Combined, the facility-wide VOC emission potential to emit is calculated to be over 50 tons using the 2010 annual emission inventory as a



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baseline.

Emissions resulting from paint booth operations with three (3) paint booths and one (1) dip tank are not included in this emission unit, but are part of emission unit U-000006.

Appendix 1-d: 2010 Facility-wide VOC emission inventory and max VOC potential to emit, excluding combustion emissions.

Appendix 3: Top 20 VOC materials used in Moog plant.

Emission unit 000003 is associated with the following emission points (EP):

02-21, 02-29, 02-31, 02-36, 02-37, 02-42, 02-51, 03-01, 03-13, 03-15, 11-13, 11-14, 11-15, 11-29, 17-22, 20-01, 20-03, 20-21, 20-24, 20-25, 20-29, 20-50, 20-51, 20-52, 20-57, 20-58, 24-04, 24-05, 24-06, 24-12, 24-13, 24-16

Process: 003 The use of equipment facility-wide which generate VOC emissions, with the exception of three spray booths and one dip tank which are part of emission unit U-000006.

Emission unit 000004 - Facility-wide soldering operation with many hand held soldering stations, wave soldering, and selective solder machines. A conservative 0.005 lb/lb lead emission rate is used to calculate Lead Oxide emissions from this operation due to the widespread nature of the emission points and the fact that each emission point is made up of small equipment, sometimes handheld which are exempt emission sources per Part 201-3.3(c)(54).

Appendix 1-e: 2010 Facility-wide soldering operation emission inventory.

Emission unit 000004 is associated with the following emission points (EP):

00001, 00002, 00003

Process: 004 The use of facility-wide soldering equipment with many hand held soldering stations, wave soldering, and selective solder machines.

Emission unit 000005 - Moog operates a non-electrolytic metal coating operation consisting of a chromate conversion coating plating line that contains the metal HAP, chromium. There are two tanks that contain chromium. Since the baths are operated at room temperature, there are no known emission factors found to quantify any potential emissions from this source. If there is no tank turbulence, it is reasonable to assume that there are no emissions (other than water vapor) because little or no volatile materials are in the process tanks. Since both tanks employ non-electrolysis plating, the standards and management practices that apply to these tanks are found at 63.11507(g) of 40CFR63 Subpart WWWW.

Process: 005 The use of a non-electrolytic metal coating operation consisting of a chromate conversion coating plating line.

Emission unit 000006 -

00006, 00007, 00008, 00009

Process: 006 The use of three paint spray booths equipped with filters and HVLP guns, and one dip tank



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which uses methylene chloride.

Emission unit 000001 - Facility-wide combustion sources including emergency generators, boilers, furnaces, engines, underground storage tank vents, and cooling towers. All sources are exempt per various exemptions under Part 201-3.2(c)(1) - (7) & (25).

Appendix 1-a: 2010 Facility-wide Natural Gas Buring Equipment Emission Inventory.

Appendix 1-b: 2010 Facility-wide Emergency Generator Equipment Emission Inventory.

Process: 001 The use of natural gas and diesel as fuel for combustion sources (boilers, furnaces, generators) throughout the facility.

Emission unit 000008 - Moog has a chemical cleaning operation which consists of numerous tanks for metal parts that uses various strong acids, including hydrochloric acid, to remove surface imperfections such as embedded iron, oxides, heat tint stains, inorganic contaminants, rust or scale. Hydrochloric acid is a Hazardous Air Pollutant (HAP) as defined by 6 NYCRR 200.1.

Emission unit 000008 is associated with the following emission points (EP):  
 11-05, 11-08, 11-09

Process: 008 Operation of the chemical cleaning process tanks using hazardous air pollutants (HAPs).

**Title V/Major Source Status**

MOOG INC is subject to Title V requirements. This determination is based on the following information: The annual potential-to-emit volatile organic compounds (VOCs) is greater than 50 tons per year.

**Program Applicability**

The following chart summarizes the applicability of MOOG INC with regards to the principal air pollution regulatory programs:

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



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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 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



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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.

**SIC Code**

**Description**

3492	FLUID POWER VALVES AND HOSE FITTINGS
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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**

**Description**

1-03-006-03	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
3-09-001-98	Less Than 10 MMBtu/Hr FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - GENERAL PROCESSES
3-09-001-99	Other Not Classified FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - GENERAL PROCESSES
3-09-011-02	Other Not Classified FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - CONVERSION COATING OF METAL PRODUCTS
3-09-011-99	Acid Cleaning Bath (Pickling) FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - CONVERSION COATING OF METAL PRODUCTS
3-09-043-00	Other Not Classified FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - SOLDERING SOLDERING: GENERAL
3-09-825-99	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - WASTEWATER, POINTS OF GENERATION
4-02-001-01	WASTEWATER: SPECIFY POINT OF GENERATION SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Paint: Solvent-Base

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**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Service 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 or 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	
000124-38-9	CARBON DIOXIDE		>= 250 tpy but < 75,000 tpy
000630-08-0	CARBON MONOXIDE		> 0 but < 2.5 tpy
018540-29-9	CHROMIUM (VI)		> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE		> 0 but < 10 tpy
007439-92-1	LEAD		> 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
0NY100-00-0	TOTAL HAP		> 0 but < 2.5 tpy
0NY998-00-0	VOC		>= 50 tpy but < 100 tpy

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 or operator can identify the cause(s) of the emergency;

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- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner 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 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 or operator seeking to establish the occurrence of an emergency has the burden of proof.

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

**Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)**

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

**Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(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 201-6.2(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 201-6.4(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 201-6.4(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.



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**Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**

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

**Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)**

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

**Item I: Severability - 6 NYCRR Part 201-6.4(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 201-6.4(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 201-6.4(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.

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- 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

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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	ECL 19-0301	53	Powers and Duties of the Department with respect to air pollution control
0-00001	40CFR 60-IIII	40	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
0-00001	40CFR 60-JJJJ	41	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
0-00006	40CFR 63-HHHHHH	49	NESHAP for Paint Stripping and Misc. Surface Coating Operations at Area Sources
0-00006	40CFR 63-HHHHHH.11173 (a)	50	NESHAP for Paint Stripping and Misc. Surface Coating - Paint Stripping
0-00006	40CFR 63-HHHHHH.11173 (c)	51	General Requirements
FACILITY	40CFR 63-HHHHHH.11177	34	NESHAP for Paint Stripping and Misc. Metal Coating - Recordkeeping
FACILITY	40CFR 63-HHHHHH.11178	35	NESHAP for Paint Stripping and Misc. Metal Coating - Recordkeeping
0-00005	40CFR 63-WWWWWW.11507 (e)	45, 46	Dry Mechanical Polishing Filter Requirements
0-00005	40CFR 63-WWWWWW.11507 (g)	47, 48	Plating and Polishing Requirements
FACILITY	40CFR 63-ZZZZ	36, 37	Reciprocating Internal Combustion



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0-00001	40CFR 63-ZZZZ	42	Engine (RICE) NESHAP Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	54	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 38, 39	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201- 6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)	23	Operational Flexibility
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	24	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212.4(c)	25	General Process



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FACILITY	6NYCRR 212.6 (a)	26	Emission Sources - emissions from new processes and/or modifications General Process
0-00007	6NYCRR 212.9 (b)	52	Emission Sources - opacity of emissions limited General Process
FACILITY	6NYCRR 215.2	9	Emission Sources - tables Open Fires - Prohibitions
0-00003	6NYCRR 226	43	SOLVENT METAL CLEANING PROCESSES
0-00003	6NYCRR 226.5	44	Reasonably Available Control Technology
FACILITY	6NYCRR 228-1.3 (a)	27	Surface Coating General Requirements-
FACILITY	6NYCRR 228-1.3 (b) (1)	28	Opacity General Requirements
FACILITY	6NYCRR 228-1.3 (c)	29	- Record Keeping Surface Coating General Requirements-
FACILITY	6NYCRR 228-1.3 (d)	30	Prohibitions Surface Coating General Requirements-
FACILITY	6NYCRR 228-1.3 (e)	31	Handling, storage and disposal Surface Coating - General control
FACILITY	6NYCRR 228-1.3 (e) (2)	32	requirements (Class A & most B) Use of 55 gallons of non-compliant coating
FACILITY	6NYCRR 228-1.5 (e)	33	Process specific RACT demonstrations

**Applicability Discussion:**

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

ECL 19-0301

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.

6 NYCRR 200.6

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

6 NYCRR 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

6 NYCRR 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.

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6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR Subpart 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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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,



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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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 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.

6 NYCRR 202-2.1

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

6 NYCRR 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.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68



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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, MOOG INC has been determined to be subject to the following regulations:

40 CFR 63.11173 (a)

This condition specifies that each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of methylene chloride (MeCl).

40 CFR 63.11173 (c)

This condition requires each paint stripping operation to maintain copies of annual usage of paint strippers containing methylene chloride (MeCl) on site at all times.

40 CFR 63.11177

40 CFR 63.11178

40 CFR 63.11507 (e)

Requirements for dry mechanical polishing using cartridge, fabric, or high efficiency particulate air filters

40 CFR 63.11507 (g)

Requirements for plating and polishing process units

40 CFR Part 60, Subpart IIII



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40 CFR Part 60, Subpart JJJJ

40 CFR Part 63, Subpart HHHHHH

40 CFR Part 63, Subpart ZZZZ

6 NYCRR 201-6.4 (f)

This section describes the operational flexibility protocol proposed by the facility. The protocol will allow the facility owner or operator to make certain changes at the facility without the need for a permit modification. Changes made pursuant to the protocol must be approved by the Department, and will be rolled into the permit during the next renewal or modification.

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 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.

6 NYCRR 212.6 (a)

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

6 NYCRR 212.9 (b)

This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

6 NYCRR 226.5

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6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b) (1)

This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (c)

This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.3 (e)

This regulation outlines the general control requirements for emissions of volatile organic compounds related to surface coating.

6 NYCRR 228-1.3 (e) (2)

This citation allows any facility to use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits required by the regulation.



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6 NYCRR 228-1.5 (e)

This citation specifies the required elements of a request to the Department, which may allow a specific coating process to use a degree of emission control less stringent than specified by the regulation.

6 NYCRR Part 226

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

**Compliance Certification**  
**Summary of monitoring activities at MOOG INC:**

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
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0-00001	40	record keeping/maintenance procedures
0-00001	41	record keeping/maintenance procedures
0-00006	49	record keeping/maintenance procedures
0-00006	50	record keeping/maintenance procedures
0-00006	51	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
0-00005	45	record keeping/maintenance procedures
0-00005	46	record keeping/maintenance procedures
0-00005	47	record keeping/maintenance procedures
0-00005	48	record keeping/maintenance procedures
0-00001	42	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	25	intermittent emission testing
FACILITY	26	monitoring of process or control device parameters as surrogate
0-00007	52	record keeping/maintenance procedures
0-00003	43	record keeping/maintenance procedures
0-00003	44	record keeping/maintenance procedures
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures

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**Basis for Monitoring**

Most of the monitoring requirements contained in this permit are based on specific monitoring methods and observations as prescribed in the applicable rules. Facility specific monitoring



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conditions were written to assure that reliable information is obtained representing the facility's compliance status for the following issues:

**Mandatory Requirements (Conditions #5, 6, 7, & 23):**

These monitoring conditions appear in all Title V permits.

**Particulate Emission & Opacity Standards (Conditions #25, 26, & 43):**

These conditions limit particulate emissions and opacity levels from process sources, and specifically the wastewater evaporator.

**Degreaser Operational Requirements (Conditions #43 & 44):**

These conditions list equipment specifications and operational requirements for cold cleaning degreasers.

**Area Source Applicability (Conditions #34, 35, & 45-51):**

These conditions set forth the requirements for establishing and maintaining a facility as an area source for purposes of 40CFR 63 Subparts WWWWWW - National Emission Standards for Plating & Polishing, and Subpart HHHHHH - National Emission Standards for Paint Stripping and Miscellaneous Surface Coating Operations.

**Surface Coating (Conditions # 27, 28, 30 & 32):**

These conditions set forth requirements for proper work practices and recordkeeping for the use of surface coatings.

**Surface Coating Volatile Organic Compounds (VOC) Process Specific Reasonable Available Control Technology (RACT) Variance (Condition #33):**

This condition describes the submission, review and approval of a Process Specific RACT determination per 6 NYCRR Part 228-1.5(e) allowing the use of certain surface coating products which exceed the VOC content limits of Subpart 228-1. Even though most coatings used by Moog comply with the VOC content limits as required by Subpart 228-1, some coatings may be used that do not meet the limits because of military, aerospace, and/or government contractual requirements.

**Emergency Generators (Conditions #40-42):**

This condition states that the facility's emergency generators are subject to 40CFR60 Subpart III, Standards of Performance for Stationary Compression Internal Combustion Engines and specifies how the generators are to comply with the rule.