

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-5620-00027/00153 Modification Number: 2



04/13/2005

Facility Identification Data

Name: PRESTOLITE ELECTRIC NY INC
Address: 400 MAIN STREET
ARCADE, NY 14009

Owner/Firm

Name: PRESTOLITE ELECTRIC INC
Address: LEECE-NEVILLE HEAVY DUTY PRODUCTS DIVISION
400 MAIN STREET
ARCADE, NY 14009-1109, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Division of Air Resources:
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Air Permitting Facility Owner Contact:
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400 MAIN STREET
ARCADE, NY 14009
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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.

Summary Description of Proposed Project

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The modification involves utilization of 4.5 tons of VOC ERCs to increase VOC emissions from EU-P-00001 - Process SVP from 19,800 lbs VOC per year to 28,800 lbs VOC per year.

Attainment Status

PRESTOLITE ELECTRIC NY INC is located in the town of ARCADE in the county of WYOMING. 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* ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
 ** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

Prestolite manufactures large and small frame alternators, large starter motors and electro-mechanical instruments.

Permit Structure and Description of Operations

The Title V permit for PRESTOLITE ELECTRIC NY 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,

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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.

PRESTOLITE ELECTRIC NY INC is defined by the following emission unit(s):

Emission unit P00008 - Alternators and other electronic components are surface-coated using paints and solvents. The coatings within this emission unit contain chromate compounds. The coatings and solvents have VOC contents that are higher than allowed in Part 228. A RACT variance has been requested and is under review by the Environmental Protection Agency.

Emission unit P00008 is associated with the following emission points (EP):
00515, 00519, 00522

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

Process: SCR is located at Building MAIN - Electrical components are surface coated using chromate-containing paints. These paints are not compliant with Part 228

Emission unit P00001 - Emission Unit P-00001 includes a surface coating operation which uses coatings which comply with Part 228, Table 1 and as such contain less than 3.5 pounds per gallon of VOC as applied. The following process is included in this emission unit:

Process SVP (emission points 00326, 00333 and 00335) - This is a conveyerized varnish dip and oven dry process for stators and other electrical components. The facility received emission reduction credits for reducing VOC emissions by using reformulated coatings. VOC emissions from this process are therefore limited to 19,800 pounds per year.

Emission unit P00001 is associated with the following emission points (EP):

00254, 00326, 00333, 00335

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

Process: RVP is located at 1ST FLOOR, Building MAIN - Rotors and other electrical components are varnished in this process.

Process: SVP is located at 1st Floor, Building MAIN - Stators and other electrical components are varnished in this process.

Emission unit P00002 - Emission Unit P-00002 includes surface coating operations regulated under 6NYCRR Part 228.7, Table 1 - Miscellaneous Metal Parts. The following processes are included in this emission unit:

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

Process SCC - Electrical components are coated in this process.

Emission unit P00002 is associated with the following emission points (EP):
00252, 00260, 00265, 00392, 00401, 00511, 00516, 00520, 00523, 00524, 00525, 00526, 00551,
00552, 00553, 00554, 00555, 00556, 00557, 00630, 00631, 00632

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

Process: RVP is located at 1st Floor, Building MAIN - Rotors and other electrical components are varnished in this process.

Process: SCC is located at 1st Floor, Building MAIN - Electrical components are coated in this process.

Emission unit P00009 - Emission Unit P-00009 includes Starter Motor Test Stands (SMT) and one emission point, #00633. Nine test stands will be installed to test starter motors manufactured at the facility. The test stands will be installed in the Main building.

Emission unit P00009 is associated with the following emission points (EP):
00633

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

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

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

Emission unit P00004 - Emission Unit P-00004 includes Process DCP and emission points 00156, 00157, 00158, 00170, 00173 and 00634. This is an aluminum die casting operation. Particulate emissions result from oil-based lubricants forming an oil fume.

Emission unit P00004 is associated with the following emission points (EP):
00156, 00157, 00158, 00170, 00173, 00634

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

Process: DCP is located at 1st Floor, Building MAIN - Process DCP includes six (6) die casting machines identified as CAST2, CAST4, CAST5, CAST6, CAST7, and CAST8. There is one 400-ton, one 600-ton, and four 800-ton die casting machines. In this process, molten aluminum is poured into steel molds that are compressed to form alternator housings. The steel molds are coated with a water borne lubricant that is 20-30% organic content. The lubricant prevents the molten aluminum from adhering to the steel molds. It has been conservatively assumed 100% of the organic-based components within the lubricant will form an oil fume that will be emitted into the air.

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

Emission unit P00005 - Emission Unit P-00005 includes the melting down of clean aluminum stock and scrap in two reverberatory, gas-fired furnaces.

Emission unit P00005 is associated with the following emission points (EP):
00510, 00514

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

Process: FUR is located at 1st Floor, Building MAIN - Process FUR melts down clean aluminum stock and scrap in two reverberatory, gas-fired furnaces. The maximum amount of aluminum that the furnaces can melt is a combined total of 250 tons per month. The potential to emit (PTE) and the emission rate potential (ERP) for this process will be based on this aluminum production level. The emissions from these furnaces are uncontrolled. During the normal melting operations, only non-HAP particulates will be emitted. For approximately one hour each day, a maximum of 15 pounds of a solid flux material is added to remove contaminants from the melt. These furnaces will emit particulates, hydrogen chloride and hydrogen fluoride during these fluxing operations. The process is regulated under 6 NYCRR Part 212. This rule establishes a limit on air emissions from general processes.

Emission unit P00006 - Emission Unit P-00006 includes Process HCU and emission points 00527 and 00635. This is a metal heat cleaning operation. Particulate emissions result from the removal of combustible materials from metal parts.

Emission unit P00006 is associated with the following emission points (EP):
00527, 00635

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

Process: HCU is located at 1st Floor, Building MAIN - Process HCU includes two (2) heat cleaning ovens identified as HEATC and HEATD. The process contaminants are controlled by afterburners identified as KEATC and KEATD. This process removes paint, grease, oils, varnish, epoxy, rubber and other combustible materials from metal parts. The parts are heated to 750F in an oxygen deficient atmosphere to enhance hydrocarbon decomposition. A 1500F afterburner is designed to provide excess air for complete combustion.

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

Emission unit P00007 - Emission Unit P-00007 is for a former conveyORIZED vapor degreasing operation utilizing trichloroethylene. The unit had a total surface area of 31.6 square feet. The degreasing operation generated 4.5 tons per year of VOC emissions for the last two years of operation. The unit was permanently removed from service on August 11, 1999.

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

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

Emission unit P00003 - Emission Unit P-00003 includes automated soldering operations for electrical components.

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Emission unit P00003 is associated with the following emission points (EP):
00019, 00512

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

Process: SOL is located at 1st Floor, Building MAIN - Process SOL performs automated soldering operations for electrical components. This process is regulated under 6 NYCRR Part 212 that sets a limit on air emissions from general processes.

Title V/Major Source Status

PRESTOLITE ELECTRIC NY INC is subject to Title V requirements. This determination is based on the following information:

Prestolite Electric, Inc. is classified as a major stationary source based on the following information:

1. A major source is defined as any stationary source that emits or has the potential to emit 10 tons per year (tpy) or more of any single hazardous air pollutant (HAP), or 25 tpy or more of any combination of hazardous air pollutants. The actual amount of single and combined HAP is less than 10 and 25 tpy, respectively, however, potential emissions are greater than the major source threshold.

2. A major stationary source is defined in a "marginal" nonattainment area and ozone transport region as the potential to emit 50 tons per year (tpy) or more of volatile organic compounds (VOC). The total actual amount of VOC emitted from Prestolite Electric, Inc. is less than 50 tpy, however, the potential VOC emissions exceed 50 tpy.

Program Applicability

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

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

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those state air pollution control regulations which specifically regulate VOC and NOx emissions.

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

Compliance Status

Facility is in compliance with all requirements

SIC Codes

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

SIC Code	Description
3694	ENGINE ELECTRICAL EQUIPMENT

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
3-13-035-01	ELECTRICAL EQUIPMENT ELECTRICAL EQUIPMENT - GENERAL PROCESSES ELECTRICAL EQUIPMENT MANUFACTURING-GENERAL PROCESSES-SOLDERING
2-04-004-02	INTERNAL COMBUSTION ENGINES - ENGINE TESTING INTERNAL COMBUSTION ENGINE: ENGINE TESTING - RECIPROCATING ENGINE Diesel/Kerosene
4-01-002-25	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING TRICHLOROETHYLENE - CONVEYORIZED VAPOR DEGREASING
3-04-001-14	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Pouring/Casting
4-02-001-01	SURFACE COATING OPERATIONS

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	SURFACE COATING APPLICATION - GENERAL
	Paint: Solvent-Base
4-02-003-01	SURFACE COATING OPERATIONS
	SURFACE COATING APPLICATION - GENERAL
	Varnish/Shellac
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 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	
		lbs/yr	Range
0NY075-00-0	PARTICULATES		>= 2.5 tpy but < 10 tpy
0NY998-00-0	VOC	28800	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to,

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bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

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

Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or

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facilities.

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

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 201-1.8

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

Item H: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part

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201-1.10(b)

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

Item I: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 201-3.2(a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

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

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

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this

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permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

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

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

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

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

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

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

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

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

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

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

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

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

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

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

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

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

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

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such

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activities, milestones or compliance were achieved; and

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

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

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

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

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

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

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- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

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

Proceedings to reopen and issue Title V facility permits 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

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provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item Y: Required Emission Tests - 6 NYCRR Part 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item AA: Open Fires - 6 NYCRR Part 215

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

Item BB: Permit Exclusion - ECL 19-0305

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

Item CC: Federally Enforceable Requirements - 40 CFR 70.6(b)

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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	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	1-18
FACILITY	40CFR 68	Chemical accident prevention provisions	2-4
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	1-19
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	24, 34, 35
FACILITY	6NYCRR 201-6.5 (c)	Permit conditions for Recordkeeping and	1-1

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FACILITY	6NYCRR 201-6.5 (c) (2)	Reporting of Compliance Monitoring Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-2
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-3
FACILITY	6NYCRR 201-6.5 (e)	Compliance Certification	1-4
FACILITY	6NYCRR 201-7	Federally-Enforceable Emission Caps	2-5, 2-6, 1-20
P-00009/-/SMT	6NYCRR 201-7	Federally-Enforceable Emission Caps	1-21
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	27
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	28
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	70
P-00008/-/SCR	6NYCRR 212.4 (b)	New processes	59
FACILITY	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	2-1
P-00003/-/SOL	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	50
P-00004/-/DCP	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	1-11
P-00005/-/FUR	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	54
P-00006/-/HCU	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	1-13
P-00009/-/SMT	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	1-16
P-00003/-/SOL	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	51
P-00004/-/DCP	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	1-12
P-00005/-/FUR	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	55, 56
P-00006/-/HCU	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	1-14
P-00009/-/SMT	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of	1-17

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P-00002/-/SCC	6NYCRR 228.1 (e) (13)	emissions limited Low-use specialty-type operation	1-10
FACILITY	6NYCRR 228.3 (e)	non-applicability Process specific RACT demonstrations	1-5
P-00002/-/SCC	6NYCRR 228.4	Opacity.	48
FACILITY	6NYCRR 228.7	Table 1	2-2, 2-3
P-00009/-/SMT	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	1-21
P-00007	6NYCRR 231-2.6	Emission reduction credits	1-15
FACILITY	6NYCRR 231-2.6 (a)	Certification of emission reductions	2-6

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 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 201-6

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 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

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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(e)

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

6NYCRR Part 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.

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.

Facility Specific Requirements

In addition to Title V, PRESTOLITE ELECTRIC NY INC has been determined to be subject to the following regulations:

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

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

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

6NYCRR 201-7

This subpart specifies how a source owner or operator may opt to avoid being subject to one or more applicable requirements to which the source or unit would have otherwise been subject, or where needed to establish an emission reduction credit by accepting federally-enforceable permit conditions restricting or capping emissions.

6NYCRR 212.4 (b)

212.4(b) establishes a limit on gas and liquid particulates.

6NYCRR 212.4 (c)

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

6NYCRR 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 228.1 (e) (13)

This rule requires facility wide low-use surface coatings used for intermittent or specialty type operations be limited to less than 55 gallons or less on a 12 month rolling basis.

6NYCRR 228.3 (e)

This citation allows owners and operators of surface coating processes to operate with a lesser degree of control than required by 6 NYCRR Part 228.3 provided that a process specific reasonably available control technology (RACT) demonstration has been made to the satisfaction of the Department. Such process specific RACT demonstrations must be submitted to the administrator for approval as a revision to the State Implementation Plan and must address the technical and economic feasibility of complying with the applicable regulations.

6NYCRR 228.4

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

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

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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 the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

6NYCRR 231-2.6

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 the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6.

6NYCRR 231-2.6 (a)

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 the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6. Emission reduction credits must be created and certified on an emission unit basis.

Compliance Certification

Summary of monitoring activities at PRESTOLITE ELECTRIC NY INC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	1-3
FACILITY	record keeping/maintenance procedures	1-4
FACILITY	monitoring of process or control device parameters as surrogate	2-6
P-00009/-/SMT	monitoring of process or control device parameters as surrogate	1-21
FACILITY	record keeping/maintenance procedures	27
P-00008/-/SCR	monitoring of process or control device parameters as surrogate	59
FACILITY	monitoring of process or control device parameters as surrogate	2-1
P-00003/-/SOL	work practice involving specific operations	50
P-00004/-/DCP	work practice involving specific operations	1-11



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P-00005/-/FUR	intermittent emission testing	54
P-00006/-/HCU	monitoring of process or control device parameters as surrogate	1-13
P-00009/-/SMT	monitoring of process or control device parameters as surrogate	1-16
P-00003/-/SOL	monitoring of process or control device parameters as surrogate	51
P-00004/-/DCP	monitoring of process or control device parameters as surrogate	1-12
P-00005/-/FUR	monitoring of process or control device parameters as surrogate	55
P-00005/-/FUR	monitoring of process or control device parameters as surrogate	56
P-00006/-/HCU	monitoring of process or control device parameters as surrogate	1-14
P-00009/-/SMT	record keeping/maintenance procedures	1-17
P-00002/-/SCC	work practice involving specific operations	1-10
FACILITY	record keeping/maintenance procedures	1-5
P-00002/-/SCC	monitoring of process or control device parameters as surrogate	48
FACILITY	work practice involving specific operations	2-2
FACILITY	work practice involving specific operations	2-3
P-00007	record keeping/maintenance procedures	1-15

Basis for Monitoring

The Prestolite Electric, Inc. Title V permit specifies special operating/monitoring conditions, record keeping and reporting required to verify compliance with the applicable requirements. The basis for monitoring for these requirements is as follows:

6NYCRR Part 212.4(c) and 6NYCRR Part 212.6(a):

The general process regulations of Part 212 specify a limit on solid particulate discharges. The monitoring conditions for the solid particulate emission sources at Prestolite were developed to provide a good degree of confidence that the specific particulate emission limits are being maintained. It is believed that the frequency and type of monitoring requested will identify any potential problems prior to an emission limit exceedance. Thus, these monitoring parameters should be used as an indicator that a problem may exist and not be interpreted as a violation of an emission limit.

6NYCRR Part 228:

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

6NYCRR Part 201-7:

Prestolite is using certified Emission Reduction Credits in accordance with 6NYCRR Part 231-2 to increase the emission limit of P-00001 from 19,800 pounds per year to 28,800 pounds per year VOC. These monitoring conditions were developed to ensure the emission limits are not exceeded.