



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

Permit ID: 9-5620-00027/00153

Renewal Number: 1

Modification Number: 1 10/22/2010

Facility Identification Data

Name: PRESTOLITE ELECTRIC NY INC

Address: 400 MAIN ST

ARCADE, NY 14009

Owner/Firm

Name: PRESTOLITE ELECTRIC INC

Address: LEECE-NEVILLE HEAVY DUTY PRODUCTS DIV
400 MAIN ST

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:

Name: WILLIAM KOCH

Address: PRESTOLITE ELECTRIC INC

400 MAIN ST

ARCADE, NY 14009

Phone:7164921700

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

This minor modification will involve the addition of a varnishing process to EU-00002, Process RVP.

Attainment Status



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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*	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, 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 P00002 - Emission Unit P-00002 includes a roll dip varnish process, a varnish



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

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

Emission unit P00002 is associated with the following emission points (EP):

00252, 00254, 00260, 00265, 00392, 00401, 00511, 00515, 00516, 00519, 00520, 00522, 00523, 00524, 00525, 00526, 00551, 00552, 00553, 00554, 00555, 00556, 00557, 00630, 00631, 00632, 00637

Process: RVP is located at 1st Floor, Building MAIN - In Process RVP, miscellaneous metal parts are varnished and dried.

Process: SCC is located at 1st Floor, Building MAIN - In Process SCC, paint spray booths are used to apply surface coatings to miscellaneous metal parts. Certain coatings used in the process exceed the VOC limit and are referenced in the Reasonably Available Control Technology (RACT) Plan. In addition, this emission unit uses low-use surface coatings for intermittent or specialty-type operations.

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

Emission 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

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 emissions from these furnaces are uncontrolled.

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

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



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Emission unit P00006 - Emission Unit P-00006 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

Process: HCU is located at 1st Floor, Building MAIN - Process HCU removes paint, grease, oils, varnish, epoxy, rubber and other combustible materials from metal parts. The parts are heated to 750F in an oxygen deficient atmosphere to enhance hydrocarbon decomposition. 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 P00009 - Emission Unit P-00009 includes test stands that are used to test starter motors manufactured at the facility. The test stands are located in the Main building.

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

Process: SMT is located at Building MAIN - Emission Unit P-00009 includes test stands that 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 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 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

Process: DCP is located at 1st Floor, Building MAIN - Process DCP includes six (6) 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.

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

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



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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.

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 is a conveyORIZED 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.

Emission unit P00001 is associated with the following emission points (EP):
00326, 00333, 00335

Process: SVP is located at 1st Floor, Building MAIN - Process SVP is a conveyORIZED varnish dip and oven dry process for stators and other electrical components. This process is regulated under 6 NYCRR Part 228 and the specific emission limits are provided in 6 NYCRR 228.7 Table 1 - Miscellaneous Metal Parts. The coating utilized in this process is applied without being diluted with VOC-containing solvents.

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

Title V/Major Source Status

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

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

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

Prestolite is a potentially major source of total HAP, individual HAPs, and NOx emissions. The facility has accepted limits on these emissions below the major source thresholds.

Prestolite is a minor source of particulate emissions. Prestolite uses particulate filters to reduce emissions from the surface coating operations.

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



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

NOTES:

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

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

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

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



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such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

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

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

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

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

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

2-04-004-02

INTERNAL COMBUSTION ENGINES - ENGINE TESTING
INTERNAL COMBUSTION ENGINE: ENGINE TESTING - RECIPROCATING ENGINE

3-04-001-14

Diesel/Kerosene
SECONDARY METAL PRODUCTION
SECONDARY METAL PRODUCTION - ALUMINUM
Pouring/Casting

3-13-035-01

ELECTRICAL EQUIPMENT
ELECTRICAL EQUIPMENT - GENERAL PROCESSES
ELECTRICAL EQUIPMENT MANUFACTURING-GENERAL PROCESSES-SOLDERING

4-02-001-01

SURFACE COATING OPERATIONS
SURFACE COATING APPLICATION - GENERAL

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4-02-003-01	Paint: Solvent-Base SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL
4-02-025-02	Varnish/Shellac SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Cleaning/Pretreatment

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	
		lbs/yr	Range
000120-80-9	1,2-BENZENEDIOL		> 0 but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000071-43-2	BENZENE		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
000067-64-1	DIMETHYL KETONE		>= 10 tpy but < 25 tpy
000112-34-5	ETHANOL, 2-(2-BUTOXYETHOXY)-		> 0 but < 10 tpy
000111-76-2	ETHANOL, 2-BUTOXY-		> 0 but < 10 tpy
000122-99-6	ETHANOL, 2-PHENOXY		> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE		> 0 but < 10 tpy
0NY100-00-0	HAP	50000	
007664-39-3	HYDROGEN FLUORIDE		> 0 but < 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 40 tpy but < 50 tpy
000106-89-8	OXIRANE, (CHLOROMETHYL)		> 0 but < 10 tpy
0NY075-00-0	PARTICULATES		>= 2.5 tpy but < 10 tpy
0NY075-00-5	PM-10		>= 2.5 tpy but < 10 tpy
011103-86-9	POTASSIUM ZINC		> 0 but < 10 tpy



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000106-51-4	CHROMATE HYDROXIDE		
000100-42-5	QUINONE		> 0 but < 10 tpy
007446-09-5	STYRENE	20000	
000108-88-3	SULFUR DIOXIDE		> 0 but < 2.5 tpy
000108-88-3	TOLUENE		> 0 but < 10 tpy
0NY998-00-0	VOC		>= 100 tpy but < 250 tpy
001330-20-7	XYLENE, M, O & P MIXT.	20000	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

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

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

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

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

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in



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the document are true, accurate, and complete.

- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:
- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
 - ii. The liability of a permittee of the Title V facility for any violation of



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applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

**Item A: General Provisions for State Enforceable Permit Terms and Condition - 6
 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description

FACILITY	ECL 19-0301	48	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-DDDDD	26, 27	Boilers and Process Heaters NESHAP rule
FACILITY	40CFR 63-MMMM	26, 27	MIScellaneous Metal Parts Coating
FACILITY	40CFR 63-PPPPP	26, 27	Engine Test Cells NESHAP
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	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	1 -5	Unavoidable noncompliance and

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FACILITY	6NYCRR 201-1.7	11	violations
FACILITY	6NYCRR 201-1.8	12	Recycling and Salvage 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	23, 37, 38	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions Fees
FACILITY	6NYCRR 201-6.5 (a) (8)	16	General conditions
FACILITY	6NYCRR 201-6.5 (c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201- 6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17	Compliance schedules
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5 (f) (6)	18	Off Permit Changes
FACILITY	6NYCRR 201-6.5 (g)	24	Permit shield
FACILITY	6NYCRR 201-7	25, 26, 27, 39, 40	Federally Enforceable Emissions Caps
P-00001/-/SVP	6NYCRR 201-7	41	Federally Enforceable Emissions Caps
P-00009/-/SMT	6NYCRR 201-7	47	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	1 -2	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 211.2	1 -6	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
P-00009/-/SMT	6NYCRR 212.10 (a) (2)	47	NOx and VOC RACT required at major facilities
P-00002/-/SCC	6NYCRR 212.4 (c)	42	General Process Emission Sources - emissions from new processes and/or modifications
P-00003/-/SOL	6NYCRR 212.4 (c)	43	General Process Emission Sources -



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P-00004/-/DCP	6NYCRR 212.4 (c)	44	emissions from new processes and/or modifications General Process Emission Sources - emissions from new processes and/or modifications
P-00005/-/FUR	6NYCRR 212.4 (c)	1 -4	General Process Emission Sources - emissions from new processes and/or modifications
P-00006/-/HCU	6NYCRR 212.4 (c)	46	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6 (a)	28	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215	9	Open Fires
FACILITY	6NYCRR 215.2	1 -1	Open Fires - Prohibitions
FACILITY	6NYCRR 228-1.1 (e) (13)	29	Low-use specialty-type operation non-applicability
FACILITY	6NYCRR 228-1.10	36	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 228-1.3 (e)	1 -3	Process specific RACT demonstrations
FACILITY	6NYCRR 228-1.4	31	Opacity
FACILITY	6NYCRR 228-1.5	32	Reports, recordkeeping, sampling and analysis
FACILITY	6NYCRR 228-1.6	33	Prohibition of sale
FACILITY	6NYCRR 228-1.7	34, 35	Table 1
P-00009/-/SMT	6NYCRR 231-2	47	New Source Review in Nonattainment Areas and Ozone Transport Region
P-00001/-/SVP	6NYCRR 231-2.6 (a)	41	Certification of emission reductions

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



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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.

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 201-6.5 (a) (4)

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

6 NYCRR 201-6.5 (a) (7)

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

6 NYCRR 201-6.5 (a) (8)



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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 201-6.5 (c)

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

6 NYCRR 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.

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

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.5 (d) (5)

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

6 NYCRR 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.

6 NYCRR 201-6.5 (f) (6)

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

6 NYCRR 201-6.5 (g)

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

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



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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 211.2

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

6 NYCRR 211.3

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

6 NYCRR Part 215

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.

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

This Part lists the regulated substances and there 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, PRESTOLITE ELECTRIC NY INC has been determined to be subject to the following regulations:

40 CFR Part 63, Subpart DDDDD

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



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40 CFR Part 63, Subpart MMMM

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from surface coating of miscellaneous parts and products. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

40 CFR Part 63, Subpart PPPPP

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from engine test cells. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

6 NYCRR 212.10 (a) (2)

Reasonably Available Control technology requirements for major facilities.

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 228-1.1 (e) (13)

This Part does not apply to the following: low-use surface coatings used for intermittent or specialty-type operations, where the combined facility-wide total usage is 55 gallons of less on a 12-month rolling basis. Records of low-use surface coatings usage must be maintained on an as used basis in a format acceptable to the department in accordance with the recordkeeping provisions of section 228.5 of this Part. Motor vehicles refinishing coating lines may qualify for this exemption prior to January 1, 2005. Beginning January 1, 2005, mobile equipment repair and refinishing or color matched coating lines will not qualify for this exemption

6 NYCRR 228-1.10

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

6 NYCRR 228-1.3 (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.

6 NYCRR 228-1.4

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



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6 NYCRR 228-1.5

Reporting, recordkeeping, sampling and analysis requirements and specifications.

6 NYCRR 228-1.6

This prohibits the selling, specifying, or requiring for use, coatings at a facility with a regulated coating line if such use is prohibited by any of the provisions of Part 228. The prohibition applies to all written or oral contracts under the terms of which any coating is to be used at an affected facility.

6 NYCRR 228-1.7

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.

6 NYCRR 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.

6 NYCRR Subpart 201-7

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

Also, the facility shall limit the emissions of oxides of nitrogen to 50 tons per year or less. Compliance with this limit shall be determined by monitoring the time of operation of each engine, the maximum horsepower of each engine and multiplying these by the NOx emission factor of 1.85 x 10⁻² pounds of NOx per horsepower-hour.

6 NYCRR Subpart 231-2

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

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR Part 63, Subpart DDDDD	Boilers and Process Heaters NESHAP rule



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Summary of monitoring activities at PRESTOLITE ELECTRIC NY INC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
P-00001/-/SVP	41	monitoring of process or control device parameters as surrogate
P-00009/-/SMT	47	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
P-00002/-/SCC	42	monitoring of process or control device parameters as surrogate
P-00003/-/SOL	43	monitoring of process or control device parameters as surrogate
P-00004/-/DCP	44	monitoring of process or control device parameters as surrogate
P-00005/-/FUR	1-4	monitoring of process or control device parameters as surrogate
P-00006/-/HCU	46	monitoring of process or control device parameters as surrogate
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	work practice involving specific operations
FACILITY	36	record keeping/maintenance procedures
FACILITY	1-3	record keeping/maintenance procedures
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	record keeping/maintenance procedures
FACILITY	34	work practice involving specific operations
FACILITY	35	record keeping/maintenance procedures

Basis for Monitoring

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

Prestolite is a potentially major source of total HAP, styrene and xylene emissions. The facility has accepted limitations on the facility-wide HAP emissions to avoid applicability to 40 CFR 63 Subpart DDDDD and Subpart MMMM. The permit requirements used to demonstrate compliance with the emission limits include monthly emission estimates. The facility is not allowed to emit more than 25 tons per 12 month period of total HAPs and 10 tons per 12 month period of any individual HAP.

Prestolite limits NOx emissions from Emission Unit P-00009 to less than 50 tons during any 12 month period. The emission limit was completed to avoid applicability to 6NYCRR Part 231-2/New Source Review and 6NYCRR Part 212-10/NOx RACT. Demonstration of compliance with the emission limit is achieved through monthly emission estimates based on actual engine usage.

Prestolite limits VOC emissions from Emission Unit P-00001 (the conveyORIZED varnish operation, process SVP) to less than 28,800 pounds for any consecutive 12-month period. The limit was imposed due to the establishment of Emission Reduction Credits under 6NYCRR Part 231-2.



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6NYCRR Part 212 - General Process Emission Sources:

Particulate emissions are generated from each process at the facility. The affected sources are subject to an allowable particulate emission rate and are regulated by an opacity limit. Compliance with this regulation is accomplished by using spray booth filters, weekly inspections of each spray booth, tracking of actual raw material usage, and weekly visible emission observations from each source.

6NYCRR Part 228, Surface Coating Processes:

The surface coating processes are subject to the Reasonably Available Control Technology (RACT) requirements of 6NYCRR Part 228. Prestolite uses approximately ten compliant coatings at the facility. In addition, the facility uses about four non-compliant coatings and has requested a variance from the RACT requirements for these materials. Prestolite currently uses one low-use specialty coating at a rate of less than 55 gallons per 12-month period.

NON-APPLICABLE REQUIREMENTS:

40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters:

Prestolite is not expected to be subject to 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. The facility is limiting the total and individual hazardous air pollutant emissions to less than major source thresholds.

40 CFR 63 Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products:

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

40 CFR 63 Subpart RRR - National Emission Standards for hazardous Air Pollutants for Secondary Aluminum Production:

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

40 CFR 64 - Compliance Assurance Monitoring:

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