



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3730-00022/02001
Effective Date: 04/07/2015 Expiration Date: 04/06/2025

Permit Issued To:HIPOTRONICS/HUBBELL INC
584 DERBY MILFORD RD
ORANGE, CT 06477-4024

Facility: HIPOTRONICS INC
1650 ST RTE 22 N
BREWSTER, NY 10509

Contact: ANTHONY MASTRO
HIPOTRONICS INC
1650 ST RTE 22 P O BOX 414
BREWSTER, NY 10509
(845) 279-3644

Description:

The facility manufactures and assembles high voltage test equipment. Permitted emission sources include five curing ovens, four paint spray booths, and a nickel electroplating tank. Emission sources exempt from permitting include various space heaters and boilers, ovens which vent only water vapor, and a woodworking process. The facility is subject to visible and VOC emission limitations, VOC recordkeeping requirements, and nickel plating emission control requirements.

New York State Department of Environmental Conservation
Facility DEC ID: 3373000022



By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: GEORGE A SWEIKERT
 NYSDEC - REGION 3
 21 S PUTT CORNERS RD
 NEW PALTZ, NY 12561-1696

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.



Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054

New York State Department of Environmental Conservation

Permit ID: 3-3730-00022/02001

Facility DEC ID: 3373000022



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To:HIPOTRONICS/HUBBELL INC
584 DERBY MILFORD RD
ORANGE, CT 06477-4024

Facility: HIPOTRONICS INC
1650 ST RTE 22 N
BREWSTER, NY 10509

Authorized Activity By Standard Industrial Classification Code:
3825 - INSTRUMENTS TO MEASURE ELEC
3612 - TRANSFORMERS

Permit Effective Date: 04/07/2015

Permit Expiration Date: 04/06/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.7: Maintenance of Equipment
- 2 6 NYCRR 201-7.1: Facility Permissible Emissions
- *3 6 NYCRR 201-7.1: Capping Monitoring Condition
- 4 6 NYCRR 211.1: Air pollution prohibited
- 5 6 NYCRR 212.4 (c): Compliance Demonstration
- 6 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 7 6 NYCRR 228-1.3 (b): Compliance Demonstration

Emission Unit Level

EU=U-00002

- 8 6 NYCRR 200.7: Compliance Demonstration
- 9 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal

EU=U-00003

- 10 40CFR 63, Subpart WWWW: Compliance Demonstration
- 11 40CFR 63.11507(b), Subpart WWWW: Compliance Demonstration
- 12 40CFR 63.11507(g), Subpart WWWW: Compliance Demonstration
- 13 40CFR 63.11509(c)(7), Subpart WWWW: Compliance Demonstration
- 14 40CFR 63.11509(f), Subpart WWWW: Compliance Demonstration

EU=U-00003,EP=NICPL

- 15 6 NYCRR 212.6 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 16 ECL 19-0301: Contaminant List
- 17 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 18 6 NYCRR Subpart 201-5: Emission Unit Definition
- 19 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 20 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 21 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 22 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 23 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 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, 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 - 6 NYCRR 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 - 6 NYCRR 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 - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR 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 facilities.

Item E: 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 F: Recycling and Salvage - 6 NYCRR 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 - 6 NYCRR 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: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 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 I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 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 J: Required Emission Tests - 6 NYCRR 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 6 NYCRR Subpart 202-1.

Item K: Open Fires Prohibitions - 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.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Maintenance of Equipment



Effective between the dates of 04/07/2015 and 04/06/2025

Applicable Federal Requirement:6 NYCRR 200.7

Item 1.1:

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.

Condition 2: Facility Permissible Emissions

Effective between the dates of 04/07/2015 and 04/06/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 2.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0

PTE: 19,000 pounds per year

Name: VOC

Condition 3: Capping Monitoring Condition

Effective between the dates of 04/07/2015 and 04/06/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 3.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 228-1.4 (d)

6 NYCRR 228-1.5

Item 3.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 3.3:

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.

Item 3.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an

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emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 3.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Total VOC emissions from the facility shall not exceed 9.5 tons in any consecutive 12 month period. The amount of all coatings and solvents purchased or used, and the amount of VOC in the coatings and solvents, shall be used to calculate VOC emissions.

This limit excludes the facility from complying with the VOC content limits relative to the varnishes used to coat magnetic wire or with VOC emission control requirements.

Parameter Monitored: VOC

Upper Permit Limit: 9.5 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 12 calendar month(s).

Condition 4: Air pollution prohibited
Effective between the dates of 04/07/2015 and 04/06/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 4.1:

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



The Compliance Demonstration applies to:

Emission Unit: U-00002	Emission Point: SPRY1
Emission Unit: U-00002	Emission Point: SPRY2
Emission Unit: U-00002	Emission Point: SPRY4
Emission Unit: U-00002	Emission Point: SPYLO

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or 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. The Department reserves the right to perform or require the performance of a Method 9 visible emissions observation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 7: Compliance Demonstration
Effective between the dates of 04/07/2015 and 04/06/2025

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b)

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must maintain and, upon request, provide the Department with a certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each coating used at the facility. In addition, purchase,

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usage, or production records of the coating material must be maintained.

Recordkeeping must also show the quantity of actual VOC emissions from the facility. If VOC emissions are equal to or greater than 3 tons per year, then the facility will be subject to VOC content limits in the coatings used on miscellaneous metal parts pursuant to Part 228-1.4(b)(4) and on miscellaneous plastic parts pursuant to Part 228-1.4(b)(5), or to the VOC emission control requirements pursuant to Part 228-1.5.

All records shall be kept for at least five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

****** Emission Unit Level ******

Condition 8: Compliance Demonstration
Effective between the dates of 04/07/2015 and 04/06/2025

Applicable Federal Requirement:6 NYCRR 200.7

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Paint booth filters shall be replaced as necessary, and a log shall be kept of when filters are replaced.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Surface Coating - Handling, storage and disposal
Effective between the dates of 04/07/2015 and 04/06/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (d)

Item 9.1:

This Condition applies to Emission Unit: U-00002



**Applicable Federal Requirement:40CFR 63.11507(g), Subpart
WWWWWW**

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00003

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of a plating or polishing process must implement the applicable management practices in 63.11507(g)(1) through (g)(12), as practicable. The annual compliance report must state that these practices have been implemented.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 13: Compliance Demonstration
Effective between the dates of 04/07/2015 and 04/06/2025**

**Applicable Federal Requirement:40CFR 63.11509(c)(7), Subpart
WWWWWW**

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00003

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



Condition 14: Compliance Demonstration
Effective between the dates of 04/07/2015 and 04/06/2025

**Applicable Federal Requirement:40CFR 63.11509(f), Subpart
WWWWWW**

Item 14.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00003

Item 14.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of an electroplating process must keep each record and report for a minimum of 5 years. The records and reports must be kept on site for at least 2 years and then may be kept offsite for the remaining 3 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 04/07/2015 and 04/06/2025

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 15.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00003 Emission Point: NICPL

Item 15.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 visible emissions observation.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent



Reference Test Method: Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item B: 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.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 16: Contaminant List
Effective between the dates of 04/07/2015 and 04/06/2025



Applicable State Requirement:ECL 19-0301

Item 16.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY100-00-0
Name: TOTAL HAP

CAS No: 0NY998-00-0
Name: VOC

Condition 17: Malfunctions and start-up/shutdown activities
Effective between the dates of 04/07/2015 and 04/06/2025

Applicable State Requirement:6 NYCRR 201-1.4

Item 17.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

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(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 18: Emission Unit Definition
Effective between the dates of 04/07/2015 and 04/06/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00001

Emission Unit Description:

This emission unit consists of two transformer curing ovens, one epoxy curing oven, and two varnish curing ovens.

Building(s): Building1

Item 18.2:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00002

Emission Unit Description:

This emission unit consists of four paint spray booths used for coating miscellaneous metal parts.

Building(s): Building2
Building3

Item 18.3:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00003

Emission Unit Description:

This emission unit is the nickel plating operation.

Building(s): Building1

Condition 19: Renewal deadlines for state facility permits
Effective between the dates of 04/07/2015 and 04/06/2025

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 19.1:

The owner or operator of a facility having an issued state facility 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.

Condition 20: Compliance Demonstration

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Facility DEC ID: 3373000022



Effective between the dates of 04/07/2015 and 04/06/2025

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 3
21 South Putt Corners Rd.
New Paltz, NY 12561

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 21: Visible Emissions Limited

Effective between the dates of 04/07/2015 and 04/06/2025

Applicable State Requirement:6 NYCRR 211.2

Item 21.1:

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.

****** Emission Unit Level ******

Condition 22: Emission Point Definition By Emission Unit

Effective between the dates of 04/07/2015 and 04/06/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 22.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00001

Emission Point: TFCO1

Height (ft.): 24

Diameter (in.): 6

NYTMN (km.): 4587.5

NYTME (km.): 619.

Building: Building1

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Emission Point: TFCO2
Height (ft.): 23 Diameter (in.): 6
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1

Emission Point: TFCOE
Height (ft.): 24 Diameter (in.): 4
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1

Emission Point: VRSH1
Height (ft.): 18 Diameter (in.): 8
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1

Emission Point: VRSH2
Height (ft.): 17 Diameter (in.): 10
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1

Item 22.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00002

Emission Point: SPRY1
Height (ft.): 24 Diameter (in.): 36
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building2

Emission Point: SPRY2
Height (ft.): 23 Diameter (in.): 36
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building2

Emission Point: SPRY4
Height (ft.): 25 Diameter (in.): 36
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building2

Emission Point: SPYLO
Height (ft.): 25 Diameter (in.): 30
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building3

Item 22.3:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00003

Emission Point: NICPL
Height (ft.): 6 Diameter (in.): 12
NYTMN (km.): 4587.5 NYTME (km.): 619. Building: Building1

Condition 23: Process Definition By Emission Unit
Effective between the dates of 04/07/2015 and 04/06/2025

Applicable State Requirement:6 NYCRR Subpart 201-5



Item 23.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: CUR Source Classification Code: 3-05-037-06
Process Description: Parts are cured in electric ovens.

Emission Source/Control: TRCO1 - Process

Emission Source/Control: TRCO2 - Process

Emission Source/Control: TRCO3 - Process

Item 23.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: VAR Source Classification Code: 4-02-003-01
Process Description:
Varnish is applied to parts by dipping them in
impregnation tanks, and then parts are cured in electric
ovens.

Emission Source/Control: VICO1 - Process

Emission Source/Control: VICO2 - Process

Item 23.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00002
Process: SPY Source Classification Code: 4-02-001-01
Process Description:
Plastic and aqueous pre-cleaned metal parts are spray
painted in spray booths. Paint overspray is pulled
through fiberglass filters by negative pressure in each
booth and exhausted out the stack. Painted parts are
dried inside the booths. Solvent is used to clean
equipment including the spray guns inside the booths.

Emission Source/Control: SBFL1 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: SBFL2 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: SBFL3 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: SBFL4 - Control
Control Type: FIBERGLASS FILTER

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Emission Source/Control: SPRY1 - Process

Emission Source/Control: SPRY2 - Process

Emission Source/Control: SPRY3 - Process

Emission Source/Control: SPRY4 - Process

Item 23.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00003

Process: NIC

Source Classification Code: 3-09-010-03

Process Description:

Transformer coils and bus bars are nickel plated in an electroplating tank. The parts are sanded and then washed in a tank prior to electroplating.

Emission Source/Control: NICPL - Process

