



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3920-00220/00018
Effective Date:

Expiration Date:

Permit Issued To: K GRAEFE AND SONS CORP
1 VAN HOUTEN ST
UPPER NYACK, NY 10960

Contact: K GRAEFE AND SONS CORP
1 VAN HOUTEN ST
NYACK, NY 10960
(845) 358-2100

Facility: K.GRAEFE AND SONS CORP
1 VAN HOUTEN ST
UPPER NYACK, NY 10960

Description:

K.GRAEFE AND SONS CORP d/b/a Petersen Boatyard and Marina and d/b/a North River Shipyard (hereinafter collectively referred to as K.GRAEFE AND SONS CORP) has recently taken over operations at the facility, which has been doing business as a recreational boatyard and marina with hull maintenance for recreational pleasure boats for many years and prior to that had also operated as a shipyard, particularly during and for many years following WWII. K.GRAEFE AND SONS CORP is now transitioning the business to include larger recreational and commercial boat repair and maintenance, including dinner cruise boats and group fishing charter boats. The services offered include general maintenance and repair (such as engine repair), installation, fabrication, and application of protective coatings for boats.

For the purpose of this filing, K.GRAEFE AND SONS CORP's boat operations with the potential for air emissions can be grouped into four operations, which are described below:

- 1) Abrasive blasting (removal of marine growth and paint from boat)
- 2) Surface coatings (spray painting)
- 3) Sprayer cleaning (using solvent to clean paint spraying equipment)
- 4) Metal welding (welding to repair boats)

The types of materials on site for these four operations include paints, paint thinner, blast media, and welding wire. Other materials can include small quantities of gasoline, diesel fuel, propane, and hydraulic oil. These materials are used in mobile equipment such as scissor lifts and fork trucks or other exempt sources such as comfort heating heaters. There are no emission stacks at the facility, except those for small exempt sources. A list of exempt sources is included in the permit application.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict

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Facility DEC ID: 3392000220



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 the expiration of permits for Title V and 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

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Permit Under the Environmental Conservation Law (ECL)

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

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1 VAN HOUTEN ST
UPPER NYACK, NY 10960

Facility: K.GRAEFE AND SONS CORP
1 VAN HOUTEN ST
UPPER NYACK, NY 10960

Authorized Activity By Standard Industrial Classification Code:
4493 - MARINAS
3731 - SHIP BUILDING AND REPAIRING

Permit Effective Date:

Permit Expiration Date:



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 5 6 NYCRR 211.1: Air pollution prohibited
- 6 6 NYCRR 211.1: Compliance Demonstration
- 7 6 NYCRR 228-1.1 (a) (2): Compliance Demonstration
- 8 6 NYCRR 228-1.1 (a) (2): Compliance Demonstration
- 9 6 NYCRR 228-1.1 (a) (2): Compliance Demonstration
- 10 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 11 6 NYCRR 228-1.3 (b): Compliance Demonstration
- 12 6 NYCRR 228-1.3 (d): Compliance Demonstration

Emission Unit Level

- 13 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

EU=U-SC001

- 14 6 NYCRR 228-1.3 (e): Surface Coating- application requirements

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 15 ECL 19-0301: Contaminant List
- 16 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 17 6 NYCRR Subpart 201-5: Emission Unit Definition
- 18 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 19 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 20 6 NYCRR 211.2: Visible Emissions Limited
- 21 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 22 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 23 6 NYCRR 212-2.1 (a): Compliance Demonstration

Emission Unit Level

- 24 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: 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 F: 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 G: 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 H: 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 I: 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 J: 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 K: 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 L: 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: Facility Permissible Emissions
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1.1:

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: 0NY075-00-0
Name: PARTICULATES

PTE: 180,000 pounds per year

**Condition 2: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2.1:

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 Subpart 201-6

Item 2.2:

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

Item 2.3:

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

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other state and federal air pollution control requirements, regulations or law.

Item 2.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an 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 2.5:

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 2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

On an annual basis, the site shall maintain records of all products used, calculate the PM emissions generated and ensure that they do not exceed 90 tons per year (site-wide).

Manufacturer Name/Model Number: N/A

Parameter Monitored: PARTICULATES

Upper Permit Limit: 180000 pounds per year

Reference Test Method: N/A

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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

**Condition 3: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

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

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otherwise be subject to:

6 NYCRR Subpart 201-6

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 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:

On an annual basis, the site shall maintain records of all products used, calculate the VOC emissions generated and ensure that they do not exceed 22.5 tons per year (site-wide).

Manufacturer Name/Model Number: Various manufacturers.

Parameter Monitored: VOC

Upper Permit Limit: 45000 pounds per year

Reference Test Method: N/A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 4: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 4.1:

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 Subpart 201-6

Item 4.2:

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

Item 4.3:

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 4.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an 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 4.5:

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 4.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

On an annual basis, the site shall maintain records of all products used, calculate the HAP emissions generated and ensure that: TOTAL HAPs do not exceed 22.5 tons per year and a single HAP does not exceed 9 tons per year (site-wide).

Manufacturer Name/Model Number: Various manufacturers.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 45000 pounds per year

Reference Test Method: N/A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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

Condition 5: Air pollution prohibited
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 211.1

Item 5.1:

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. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 6: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 211.1

Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately



received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint phone line available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.
5. Report in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 228-1.1 (a) (2)

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The Facility's owner or operator shall ensure that all products used shall comply with the limits stated within the EPA guidance Table 1-1 as shown below.

VOC Limits for Shipbuilding and Repair Operations

(Reference: EPA 453/R-94-032 - Table 1-1):

Coating Category: VOC Limits (a)

General Use: 340 gr/l (b) or 2.83 lbs/gal (b)

Specialty

- Air Flask: 340 gr/l or 2.83 lbs/gal (b)
- Antenna: 530 gr/l or 4.42 lbs/gal (b)
- Antifoulant: 400 gr/l or 3.33 lbs/gal (b)
- Heat Resistant: 420 gr/l or 3.50 lbs/gal (b)
- High Gloss: 420 gr/l or 3.50 lbs/gal (b)
- High Temp: 500 gr/l or 4.17 lbs/gal (b)
- Inorganic Zinc High
build primer: 340 gr/l or 2.83 lbs/gal (b)
- Weld Through
(shop) primer: 650 gr/l or 5.42 lbs/gal (b)
- Military Exterior: 340 gr/l or 2.83 lbs/gal (b)

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- Mist: 610 gr/l or 5.08 lbs/gal (b)
- Navigational Aids: 550 gr/l or 4.58 lbs/gal (b)
- Nonskid: 340 gr/l or 2.83 lbs/gal (b)
- Nuclear: 420 gr/l or 3.50 lbs/gal (b)
- Organic zinc: 360 gr/l or 3.00 lbs/gal (b)
- Pre-treatment wash primer: 780 gr/l or 6.50 lbs/gal (b)
- Repair and Maintenance of thermoplastic of commercial vessels: 550 gr/l or 4.58 lbs/gal (b)
- Rubber camouflage: 340 gr/l or 2.83 lbs/gal (b)
- Sealant coat for thermal spray aluminum: 610 gr/l or 5.08 lbs/gal (b)
- Special marking: 490 gr/l or 4.08 lbs/gal (b)
- Specialty interior: 340 gr/l or 2.83 lbs/gal (b)
- Tack coat: 610 gr/l or 5.08 lbs/gal (b)
- Undersea weapons systems: 340 gr/l or 2.83 lbs/gal (b)

Notes:

(a) VOC content limits are expressed in units of mass of VOC (grams or pounds) per volume of coating (liters or gallons) less water and less "exempt" solvents as applied. Volatile compounds classified by EPA as having negligible photochemical reactivity are listed in 40 CFR 51.100(s).

(b) To convert from grams/liter to pounds/gallon multiply by: $[(3.785 \text{ l/gal}) * (\text{lb}/453.6 \text{ gram})]$.

(c) For the "Upper Limit" of the different constituents of paints, use above Table limits as per category listed.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Manufacturer Name/Model Number: VARIOUS

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 340 grams per liter

Reference Test Method: N/A

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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

**Condition 8: Compliance Demonstration
Effective for entire length of Permit**



Applicable Federal Requirement:6 NYCRR 228-1.1 (a) (2)

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Facility shall employ the most current methods and practices to contain, restrict, redirect and prevent emissions from emanating outside the site's property line.

For instance, the Facility currently uses self-supporting portable enclosures (curtains) which are designed to control particulate matter emissions generated during abrasive blasting and painting of ship hulls, and to some degree control VOC emissions for painting operations.

The Facility is permitted to carry out blasting, surface cleaning, surface coating or other operations ONLY at the area of the ship that is enclosed by the protected curtains. The Facility is not permitted to work at areas of the ship located above or over the curtains.

Additionally, blasting media and blasted material are being retained by a tarp liner which is spread underneath the elevated boat. The liner is being replaced by a new one approximately every third job. The used liner then is being collected by a Hazardous materials collector.

Manufacturer Name/Model Number: VARIOUS

Reference Test Method: N/A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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

**Condition 9: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 228-1.1 (a) (2)

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.



Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Facility shall not perform any blasting or surface coating operations when it is windy enough for winds to be able to carry paint or blasted media outside the site's property line or the River.

Reference Test Method: N/A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 10: Compliance Demonstration
Effective for entire length of Permit**

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

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 10.2:

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 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. Compliance will be determined by conducting daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator



observes any visible emissions (other than steam – see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions persist after corrections are made, the permittee will immediately notify the department and may be required to conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 11: Compliance Demonstration
Effective for entire length of Permit**

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

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to this subpart must maintain and upon request provide the department with a certification from the coating supplier/manufacturer which lists the parameters used to determine the actual VOC content of each as applied



coating used at the facility. In addition, purchase, usage, inventory and/or production records of the coating material including solvents must be maintained in a format acceptable to the department and upon request, these records must be submitted to the department within 90 days of receiving such request.

Reference Test Method: N/A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective for entire length of Permit

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

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC

solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply

to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface



- coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) clean hand held spray guns by one of the following:
- (1) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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

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

**Condition 13: Emission Unit Permissible Emissions
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 13.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited

shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: U-BL001

CAS No: 0NY075-00-0

Name: PARTICULATES

PTE(s): 6.66 pounds per hour



29,160 pounds per year

Emission Unit: U-SC001

CAS No: 0NY075-00-0

Name: PARTICULATES

PTE(s): 67.63 pounds per hour

98,000 pounds per year

Emission Unit: U-WE001

CAS No: 0NY075-00-0

Name: PARTICULATES

PTE(s): 0.066 pounds per hour

290 pounds per year

Emission Unit: U-SC001

CAS No: 0NY100-00-0

Name: TOTAL HAP

PTE(s): 10.28 pounds per hour

45,000 pounds per year

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 10.28 pounds per hour

45,000 pounds per year

**Condition 14: Surface Coating- application requirements
Effective for entire length of Permit**

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

Item 14.1:

This Condition applies to Emission Unit: U-SC001

Item 14.2:

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;
- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;

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(vii) airless spray, (including air assisted);

(viii) airbrush application methods for stenciling, lettering, and other identification markings; or

(ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.



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: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

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

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

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

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

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

Item B: Public Access to Recordkeeping for 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 C: **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 15: Contaminant List
Effective for entire length of Permit**

Applicable State Requirement:ECL 19-0301

Item 15.1:

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

CAS No: 000822-06-0
Name: HEXANE, 1,6-DIISOCYANATO-

CAS No: 004083-64-1
Name: BENZENESULFONYL ISOCYANATE, 4-METHYL-

CAS No: 007439-96-5
Name: MANGANESE

CAS No: 007440-02-0



Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 007440-47-3

Name: CHROMIUM

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 16: Malfunctions and start-up/shutdown activities
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 201-1.4

Item 16.1:

(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.

(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 17: Emission Unit Definition
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1:

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

Emission Unit: U-BL001

Emission Unit Description:

This emission unit comprises abrasive blasting operations. The Facility uses a wet abrasive blasting method to prepare the boats' surface for painting. High pressure water blasting equipment and glass media is used. The maximum work area at any one time is 200 feet by 50 feet. These operations are performed in an outdoor work area and can emit particulate matter. Blasting will be performed any time during regular business hours.

Building(s): OUTDOORS

Item 17.2:

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

Emission Unit: U-SC001

Emission Unit Description:

Boat surface coating operations and sprayer cleaning occur in an outdoor area. The Facility operates one 460 ton lift to raise large boats for surface coating on land. Only one large boat (maximum 200 ft by 40 ft) can be surface coated at a time in the facility. The Hull is the main part of the boat that is being surface-coated by sprayers. Coating above the curtain is being done with rollers and brushes. No sprayers will be used in areas above the curtains. Paint, thinner and other chemicals usage records are retained, can be calculated on an annual basis to ensure that they do not exceed the thresholds.

Building(s): OPEN SHED
OUTDOORS

Item 17.3:

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

Emission Unit: U-WE001

Emission Unit Description:

This emission unit comprises welding operations. The Facility carries out some occasional welding to repair the boats. The facility has six portable welding machines (powered by gasoline, diesel fuel or electricity) which



are used for different are welding methods with consumable electrodes. The welding methods are commonly referred to as: flus core arc welding (FCAW), gas metal arc welding (GMAW) and shield metal arc (SMAW). Welding can be performed any time during normal business hours.

Building(s): OUTDOORS

**Condition 18: Renewal deadlines for state facility permits
Effective for entire length of Permit**

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

Item 18.1:

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 19: Compliance Demonstration
Effective for entire length of Permit**

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

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 19.2:

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: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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

**Condition 20: Visible Emissions Limited
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 211.2

Item 20.1:



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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.

**Condition 21: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 212-2.1 (a)

Item 21.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 004083-64-1 BENZENESULFONYL ISOCYANATE,
4-METHYL-
CAS No: 000822-06-0 HEXANE, 1,6-DIISOCYANATO-

Item 21.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The limit below is a site-wide cap for the total of the subject chemicals. Emissions shall be calculated based on usage records (purchased records minus inventory). Records shall be maintained at the site for five years.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Manufacturer Name/Model Number: Not Available

Parameter Monitored: HEXANE, 1,6-DIISOCYANATO-

Upper Permit Limit: 100 pounds per year

Reference Test Method: N/A

Monitoring Frequency: ANNUALLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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

**Condition 22: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 212-2.1 (a)

Item 22.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

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Item 22.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The limit below is a site-wide cap for the subject chemical. Emissions shall be calculated based on usage records (purchased records minus inventory). Records shall be maintained at the site for five years.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: WELDING ROD

Manufacturer Name/Model Number: VARIOUS

Parameter Monitored: CHROMIUM

Upper Permit Limit: 250 pounds per year

Reference Test Method: N/A

Monitoring Frequency: ANNUALLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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

**Condition 23: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 212-2.1 (a)

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007440-02-0 NICKEL METAL AND INSOLUBLE
COMPOUNDS

CAS No: 007439-96-5 MANGANESE

Item 23.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility shall limit the emissions of both Magnanese and Nickel Metal and Insoluble compounds to 10 pounds each per year. The calculated emissions will be the result of an emission factor multiplied by the total usage of the listed Process Material, i.e. welded rod. An established emission factor will be determine/provided for each different material used.

Each time a new process material/welded rod is used, it shall be documented and an emission factor will

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be established.
The records will indicate the different products used, their emission factor for the above contaminants, the total usage of the product and then the calculated emissions of the Manganese and Nickel Metal and Insoluble compounds.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: WELDING ROD
Manufacturer Name/Model Number: VARIOUS
Parameter Monitored: MANGANESE
Upper Permit Limit: 10 pounds per year
Reference Test Method: N/A
Monitoring Frequency: ANNUALLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

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

**Condition 24: Process Definition By Emission Unit
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1:

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

Emission Unit: U-BL001
Process: B01 Source Classification Code: 3-09-002-01
Process Description:
The abrasive blasting process results in fugitive emissions of particulate matter. This operation occurs outdoors. It uses wet blasting with panel glass media.

Emission Source/Control: BL001 - Process
Design Capacity: 1,080,000 pounds per year

Item 24.2:

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

Emission Unit: U-SC001
Process: 001 Source Classification Code: 4-02-023-99
Process Description:



Surface coating operations - Protective coatings are applied to the hull and top sides of recreational and commercial boats up to 200 feet by 40 feet. These coatings are applied by means of brush and rollers or airless sprayers. Boats can be spray-painted during normal business hours (Monday to Sunday 7:00 AM to 7:00 PM).

The spray painting is performed outdoors in a maximum 200 feet x 50 feet area. To reduce emissions into the atmosphere and keep paint away from other surfaces, an airless sprayer is used. The facility can only spray one boat at any one time. Also, prior to painting large 27 feet x 24 feet screens are placed around the spray painting area.

The paints used for boat coatings consist of general use paints (for boat top sides and decks) and antifouling paints (for the underneath part of the hulls). Some paints are mixed with small ratio of thinner per manufacturer specifications.

The surface coating operations can emit VOCs and also HAPs (if HAPs are contained in the paint). Another source of potential emissions is particulate matter (PM), or the "solids" portion the surface coating material.

If Maximum hourly design rate (MHDR) of the airless sprayer (only use one sprayer at a time) was used to compute potential-to-emit (PTE) Particulate Matter (PM) emissions, the emissions would be significantly overstated, which is common with spray painting operations. The PTE of the PM using the MHDR of the sprayer with the tip and transfer efficiency, would yield 296 ton per year of PM. However, the maximum emissions possible from the operations are significantly less than the unrestricted PTE, based on the MHDR and transfer efficiency of the sprayer. For this reason, the facility is requesting a federally enforceable emissions cap.

Based on a current paint usage of 3,465 gallons/year, the actual emissions are estimated at 1.95 tpy PM.

Emission Source/Control: SG001 - Process
Design Capacity: 22.8 gallons per hour

Emission Source/Control: SG002 - Process
Design Capacity: 22.8 gallons per hour

Item 24.3:

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

Emission Unit: U-SC001

Process: 002

Source Classification Code: 4-02-023-05

Process Description:

Sprayer cleaning. Paint thinner is used to clean the

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paint sprayer and its hose. This process will generate emissions of VOCs and HAPs.

Emission Source/Control: SG001 - Process

Design Capacity: 22.8 gallons per hour

Emission Source/Control: SG002 - Process

Design Capacity: 22.8 gallons per hour

Item 24.4:

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

Emission Unit: U-WE001

Process: W01

Source Classification Code: 3-09-005-01

Process Description:

This process uses consumable welding wire for the welding operation. It results in fugitive emissions of particulate matter and trace quantities of metal HAPs.

Emission Source/Control: WE001 - Process

Design Capacity: 12,000 pounds per year