



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 4-0138-00001/00031
Mod 0 Effective Date: 10/15/2013 Expiration Date: 10/14/2023
Mod 1 Effective Date: 10/15/2018 Expiration Date: 10/14/2023
Mod 2 Effective Date: 04/10/2019 Expiration Date: No expiration date.
Mod 3 Effective Date: 04/26/2019 Expiration Date: 10/14/2023

Permit Issued To: HANNAY REELS INC
553 ST RTE 143
PO BOX 159
WESTERLO, NY 12193-0159

Contact: HANNAY REELS INC
553 ST RTE 143
PO BOX 159
WESTERLO, NY 12193-0159
(518) 797-3791

Facility: HANNAY REELS INC
553 ST RTE 143
WESTERLO, NY 12193

Description:
Modification to the permit to add two emission points to an existing curing oven and extension of the coating variance. Notification of two new welding points. This modification does not result in any change in the total VOC emissions.

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: NANCY M BAKER
NYSDEC - REGION 4
1130 N WESTCOTT RD
SCHENECTADY, NY 12306-2014

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
- 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 4 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 3-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3-1.1:

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 3-1.2:

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

Item 3-1.3

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 4 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

New York State Department of Environmental Conservation
Facility DEC ID: 4013800001



Region 4 Headquarters
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014
(518) 357-2069

New York State Department of Environmental Conservation

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: HANNAY REELS INC
553 ST RTE 143
PO BOX 159
WESTERLO, NY 12193-0159

Facility: HANNAY REELS INC
553 ST RTE 143
WESTERLO, NY 12193

Authorized Activity By Standard Industrial Classification Code:
3499 - FABRICATED METAL PRODUCTS, NEC
3569 - GEN INDUSTRIAL MACHINERY, NEC

Mod 0 Permit Effective Date: 10/15/2013

Permit Expiration Date: 10/14/2023

Mod 1 Permit Effective Date: 10/15/2018

Permit Expiration Date: 10/14/2023

Mod 3 Permit Effective Date: 04/26/2019

Permit Expiration Date: 10/14/2023



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-7.1: Facility Permissible Emissions
- *2 6 NYCRR 201-7.1: Capping Monitoring Condition
- *3 6 NYCRR 201-7.1: Capping Monitoring Condition
- *4 6 NYCRR 201-7.1: Capping Monitoring Condition
- 27 6 NYCRR 211.2: Visible Emissions Limited
- 3-1 6 NYCRR 212-2.4 (a): Compliance Demonstration
- 3-2 6 NYCRR 212-2.4 (a): Compliance Demonstration
- 8 6 NYCRR 225-1.2 (f): Compliance Demonstration
- 9 6 NYCRR 225-1.2 (h): Compliance Demonstration
- 10 6 NYCRR 228-1.1 (a) (3): Once in always in
- 11 6 NYCRR 228-1.4 (b) (4): Compliance Demonstration
- 3-3 6 NYCRR 228-1.5 (e): Compliance Demonstration
- 13 6 NYCRR 228-1.5 (e): Compliance Demonstration
- 14 40CFR 63.11516(f), Subpart XXXXXX: Compliance Demonstration
- 15 40CFR 63.11519, NESHAP Subpart XXXXXX: Compliance Demonstration

Emission Unit Level

EU=0-00001

- 16 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 17 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 18 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 19 6 NYCRR 228-1.3 (e): Surface Coating- application requirements
- 20 6 NYCRR 228-1.6 (a): Compliance Demonstration

EU=0-00001,Proc=003

- 21 6 NYCRR 226.2: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 22 ECL 19-0301: Contaminant List
- 23 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 24 6 NYCRR Subpart 201-5: Emission Unit Definition
- 25 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 26 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 5 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 28 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 29 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

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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 between the dates of 10/15/2013 and 10/14/2023**

Applicable Federal Requirement: 6 NYCRR 201-7.1

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:

per year	CAS No: 000050-00-0 (From Mod 3)	PTE: 19,000 pounds
	Name: FORMALDEHYDE	
per year	CAS No: 000067-56-1 (From Mod 3)	PTE: 19,000 pounds
	Name: METHYL ALCOHOL	
per year	CAS No: 000098-82-8 (From Mod 3)	PTE: 19,000 pounds
	Name: BENZENE, (1-METHYLETHYL)	
per year	CAS No: 000100-41-4 (From Mod 3)	PTE: 19,000 pounds
	Name: ETHYLBENZENE	
per year	CAS No: 000100-42-5 (From Mod 3)	PTE: 19,000 pounds
	Name: STYRENE	
	CAS No: 000107-21-1 (From Mod 3)	PTE: 19,000 pounds

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per year	Name: 1,2-ETHANEDIOL		
	CAS No: 000108-10-1 (From Mod 3)	PTE:	19,000 pounds
per year	Name: 2-PENTANONE, 4-METHYL		
	CAS No: 000108-88-3 (From Mod 3)	PTE:	19,000 pounds
per year	Name: TOLUENE		
	CAS No: 000111-46-6 (From Mod 3)	PTE:	19,000 pounds
per year	Name: ETHANOL, 2,2'-OXYBIS-		
	CAS No: 000111-76-2 (From Mod 3)	PTE:	19,000 pounds
per year	Name: ETHANOL, 2-BUTOXY-		
	CAS No: 000111-90-0 (From Mod 3)	PTE:	19,000 pounds
per year	Name: ETHANOL, 2- (2-ETHOXYETHOXY)		
	CAS No: 000112-34-5 (From Mod 3)	PTE:	19,000 pounds
per year	Name: ETHANOL, 2-(2-BUTOXYETHOXY)-		
	CAS No: 001330-20-7 (From Mod 3)	PTE:	19,000 pounds
per year	Name: XYLENE, M, O & P MIXT.		
	CAS No: 002807-30-9 (From Mod 3)	PTE:	19,000 pounds
per year	Name: 2-PROPOXY ETHANOL		
	CAS No: 007439-92-1 (From Mod 3)	PTE:	19,000 pounds
per year	Name: LEAD		
	CAS No: 068186-90-3 (From Mod 3)	PTE:	19,000 pounds
per year	Name: CI PIGMENT BROWN 24		
	CAS No: 0NY100-00-0 (From Mod 3)	PTE:	47,500 pounds
per year	Name: TOTAL HAP		
	CAS No: 0NY998-00-0 (From Mod 3)	PTE:	95,000 pounds
per year	Name: VOC		

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Condition 2: Capping Monitoring Condition
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement:6 NYCRR 201-7.1

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 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: 0NY998-00-0 VOC

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emissions of volatile organic compounds (VOC) shall be less than 47.5 tons per year, calculated on a rolling



monthly basis.

The facility shall compile and maintain records of the total usage of each coating, solvent, and the resulting emissions of volatile organic compounds in order to demonstrate continuous compliance with the cap. Records must be included with the annual report and kept on site for a minimum of five years.

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 1/30/2014.

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

Condition 3: Capping Monitoring Condition
Effective between the dates of 10/15/2013 and 10/14/2023

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 Subpart 201-6
40 CFR Part 63, Subpart MMMM

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

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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: 0NY100-00-0 TOTAL HAP

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of total hazardous air pollutants (HAP) shall be less than 23.75 tons per year, calculated on a rolling monthly basis.

The facility shall compile and maintain records of the total usage of each coating, solvent, and the resulting emissions of hazardous air pollutants in order to demonstrate continuous compliance with the cap. Records must be included with the annual report and kept on site for a minimum of five years.

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 1/30/2014.

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

Condition 4: Capping Monitoring Condition

Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement:6 NYCRR 201-7.1

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

40 CFR Part 63, Subpart M

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.

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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: 000067-56-1	METHYL ALCOHOL
CAS No: 000098-82-8	BENZENE, (1-METHYLETHYL)
CAS No: 000100-41-4	ETHYLBENZENE
CAS No: 000100-42-5	STYRENE
CAS No: 000107-21-1	1,2-ETHANEDIOL
CAS No: 000108-10-1	2-PENTANONE, 4-METHYL
CAS No: 000108-88-3	TOLUENE
CAS No: 000111-46-6	ETHANOL, 2,2'-OXYBIS-
CAS No: 000111-76-2	ETHANOL, 2-BUTOXY-
CAS No: 000111-90-0	ETHANOL, 2- (2-ETHOXYETHOXY)
CAS No: 000112-34-5	ETHANOL, 2-(2-BUTOXYETHOXY)-
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 002807-30-9	2-PROPOXY ETHANOL
CAS No: 007439-92-1	LEAD
CAS No: 068186-90-3	CI PIGMENT BROWN 24
CAS No: 000050-00-0	FORMALDEHYDE

Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of each individual hazardous air pollutant (HAP) shall be less than 9.75 tons per year, calculated on a rolling monthly basis.

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servicability every 6 months. If a filter is found to be not servicable, it shall be replaced. A record documenting the inspection and replacement of the filters shall be kept at the facility for a minimum of 5 years.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3-2: Compliance Demonstration

Effective between the dates of 04/26/2019 and 10/14/2023

Applicable Federal Requirement:6 NYCRR 212-2.4 (a)

Item 3-2.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001	Emission Point: 0003A
Emission Unit: 0-00001	Emission Point: 0003B
Emission Unit: 0-00001	Emission Point: 05S1A
Emission Unit: 0-00001	Emission Point: 05S1B
Emission Unit: 0-00001	Emission Point: 05S1C
Emission Unit: 0-00001	Emission Point: 05S1D
Emission Unit: 0-00001	Emission Point: 05SPA
Emission Unit: 0-00001	Emission Point: 05SPB
Emission Unit: 0-00001	Emission Point: 05SPC
Emission Unit: 0-00001	Emission Point: 05SPD
Emission Unit: 0-00001	Emission Point: 05SSA
Emission Unit: 0-00001	Emission Point: 05SSB
Emission Unit: 0-00001	Emission Point: 05SSC
Emission Unit: 0-00001	Emission Point: 05SSD

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3-2.2:

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per dry standard cubic foot of exhaust gas. Compliance testing will be conducted at the discretion of the Department.

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Reference Test Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement:6 NYCRR 225-1.2 (f)

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: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of commercial, industrial, or residential emission sources that fire number two heating oil on or after July 1, 2012 are limited to the purchase of number two heating oil with 0.0015 percent sulfur by weight or less. Compliance with this limit will be based on vendor certifications.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NUMBER 2 HEATING OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.0015 percent by weight

Monitoring Frequency: PER DELIVERY



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Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 9: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement:6 NYCRR 225-1.2 (h)

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: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

Owners and/or operators of a stationary combustion installations that fire distillate oil are limited to the firing of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2016. Compliance with this limit will be based on vendor certifications.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 0.0015 percent by weight
Monitoring Frequency: PER DELIVERY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Once in always in
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement:6 NYCRR 228-1.1 (a) (3)

Item 10.1:

Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain



subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

Condition 11: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement: 6 NYCRR 228-1.4 (b) (4)

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 facility owner or operator may not use any miscellaneous metal parts coatings with an as applied VOC content in excess of the limits specified in Table B4 of 6 NYCRR Part 228-1.4(b)(4) unless the facility has been granted a facility specific RACT variance by the Department. All record keeping, reports, sampling, and analysis must be conducted as described in 6 NYCRR Parts 228-1.3 and 228-1.6.

The as applied VOC content shall be calculated using the following formula:

$$(\text{VOC})_a = [(\text{Wv})_a - (\text{Ww})_a - (\text{We})_a] / [1 - [(\text{Vw})_a + (\text{Ve})_a]]$$

Where:

(VOC)_a is the VOC content of a coating, as applied, expressed as weight of VOC per volume of coating minus water and excluded compounds.

(Wv)_a is the weight of total volatiles per volume of an as applied coating.

(Ww)_a is the weight of water per volume of an as applied coating.

(We)_a is the weight of excluded compounds per volume of an as applied coating.

(Vw)_a is the volume of water per volume of an as applied coating.

(Ve)_a is the volume of excluded compounds per volume of an

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as applied coating.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3-3: Compliance Demonstration
Effective between the dates of 04/26/2019 and 10/14/2023

Applicable Federal Requirement:6 NYCRR 228-1.5 (e)

Item 3-3.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 3-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Variance: The annual VOC emissions from non-compliant coatings shall not exceed 8 tons per year.

The facility shall submit any changes to the list of coatings used under this variance and listed in Process 002, with the coating MSDS, to the Department. Changes that meet all of the criteria given in 6 NYCRR Part 201-5.4(e) may be conducted without the prior approval of the Department and shall not require modification of the permit. The facility shall notify the Department 30 days in advance of any changes meeting the criteria given in 6 NYCRR Part 201-5.4(c).

On an annual basis, the responsible official shall provide a report to the Department which documents compliance with the 8 ton/year limit. The VOC emissions, total usage of each coating, and any make up solvent usage shall be included in the report.

Any exceedence of the 8 ton/year limit shall be grounds for the Department to revoke this variance.

This variance expires 5 years from the most recent permit effective date.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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The initial report is due 1/30/2020.
Subsequent reports are due every 12 calendar month(s).

Condition 13: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement:6 NYCRR 228-1.5 (e)

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Variance: The annual VOC emissions from non-compliant coatings shall not exceed 8 tons per year.

The facility shall submit any changes to the list of coatings used under this variance and listed in Process 002, with the coating MSDS, to the Department. Changes that meet all of the criteria given in 6 NYCRR Part 201-5.4(e) may be conducted without the prior approval of the Department and shall not require modification of the permit. The facility shall notify the Department 30 days in advance of any changes meeting the criteria given in 6 NYCRR Part 201-5.4(c).

On an annual basis, the responsible official shall provide a report to the Department which documents compliance with the 8 ton/year limit. The VOC emissions, total usage of each coating, and any make up solvent usage shall be included in the report.

Any exceedence of the 8 ton/year limit shall be grounds for the Department to revoke this variance.

This variance expires 5 years from the date of permit issuance.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 12 calendar month(s).

Condition 14: Compliance Demonstration



Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement:40CFR 63.11516(f), Subpart XXXXXX

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a welding affected source must comply with the requirements of paragraphs (1) and (2) below for each welding operation that uses materials that contain Metal Fabrication and Finishing HAPs (MFHAP) or that have the potential to emit MFHAP. For the purposes of this condition, the MFHAPs are compounds containing any of the following metals: Cadmium, Chromium, Lead, Manganese, and Nickel.

(1) The facility must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. To demonstrate compliance with this requirement, the owner or operator must maintain a record of the manufacturer's specifications for the capture and control devices, as specified in 40 CFR 63.11519(c)(4).

(2) The facility must implement one or more of the management practices specified in paragraphs (i) through (v) below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of engineering judgement.

(i) Use a welding process with reduced fume generation capabilities (e.g. gas metal arc welding (GMAW) - also called metal inert gas welding (MIG));

(ii) Use welding process variations (e.g. pulsed current GMAW) which can reduce fume generation rates;

(iii) Use welding filler materials, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;

(iv) Optimize welding process variables (e.g. electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and

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(v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

If the facility uses more than 2,000 pounds of welding rod during any 12-month period, the requirements of 40 CFR 63.11516(f)(3) - 63.11516(f)(8) apply in addition to the requirements listed above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement: 40CFR 63.11519, NESHAP Subpart
XXXXXX

Item 15.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 15.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

- (a) The facility owner or operator must prepare and submit an initial notification, as described in 40 CFR 63.11519(a)(1), within 60 days of the effective date of this permit. In addition, the facility owner or operator must prepare and submit a notification of compliance status, as described in 40 CFR 63.11519(a)(2), within 120 days of the effective date of this permit.
- (b) The facility owner or operator must prepare and submit an annual report that contains the information specified in 40 CFR 63.11519(b)(4) through 40 CFR 63.11519(b)(7), as applicable, if the facility uses more than 2,000 pounds of welding rod containing MFHAP during the preceding 12-month period. Annual reports submitted in accordance with this paragraph are due according to the schedule given in 40 CFR 63.11519(b)(2).
- (c) The facility owner or operator must keep the following records at the facility for a period of at least five years and make them available to the department upon request:

(1) A copy of each notification and report, and any supporting documentation, submitted in order to comply

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with 40 CFR 63 Subpart XXXXXX. This includes records of any applicability determinations and any changes to those determinations and the date(s) on which they occurred.

(2) Visual emissions determinations for any periods where the facility is required to make them.

(3) A copy of the site specific welding emissions management plan, if applicable.

(4) If the facility chooses to comply with 40 CFR 63 Subpart XXXXXX by operating any equipment according to manufacturer's instructions, copies of those instructions.

(5) Records indicating the amount of welding rod used on a rolling 12-month basis.

Monitoring Frequency: ANNUALLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Condition 16: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

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

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 16.2:

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 a Method 9 opacity evaluation at a minimum frequency of once per year, while the source is in normal operating mode.

In addition to the above opacity evaluation, the permittee will conduct daily observations of visible emissions from

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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).

The results of each observation 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?

Incident weather conditions shall be recorded for those days when observations are prohibited. 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 above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and 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



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Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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Condition 18: Surface Coating - Handling, storage and disposal
Effective between the dates of 10/15/2013 and 10/14/2023

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

Item 18.1:

This Condition applies to Emission Unit: 0-00001

Item 18.2:

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

- (1) 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;
- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) 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;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
 - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Condition 19: Surface Coating- application requirements
Effective between the dates of 10/15/2013 and 10/14/2023

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

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Item 19.1:

This Condition applies to Emission Unit: 0-00001

Item 19.2:

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;
- (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.

Condition 20: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement:6 NYCRR 228-1.6 (a)

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with

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EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable Federal Requirement: 6 NYCRR 226.2

Replaces Condition(s) 19

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: 003

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A person conducting solvent metal cleaning must:

(a) store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere;

(b) maintain equipment to minimize leaks and fugitive emissions;

(c) display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs;

(d) keep the degreaser cover closed except when parts are being placed into or being removed from the degreaser, the cover needs to be open in order to add or remove solvent from the degreaser, no solvent is in the degreaser, or manually cleaning metal parts in a cold cleaning degreaser;

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(e) create and retain a record of solvent consumption for five years. This record must be made available to the department upon request;

(f) not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser; and

(g) if using a cold cleaning degreaser that is subject to section 226.3(a)(4) of this Part, retain a record of the following three items for five years and provide these records to the department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a material safety data sheet (MSDS), or other appropriate documentation acceptable to the department may be used to comply with this requirement:

(1) the name and address of the solvent supplier;

(2) the type of solvent including the product or vendor identification number; and

(3) the vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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 22: Contaminant List
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable State Requirement:ECL 19-0301

Item 22.1:

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

CAS No: 000050-00-0
Name: FORMALDEHYDE

CAS No: 000067-56-1
Name: METHYL ALCOHOL

CAS No: 000098-82-8
Name: BENZENE, (1-METHYLETHYL)

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CAS No: 000100-41-4
Name: ETHYLBENZENE

CAS No: 000100-42-5
Name: STYRENE

CAS No: 000107-21-1
Name: 1,2-ETHANEDIOL

CAS No: 000108-10-1
Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 000111-46-6
Name: ETHANOL, 2,2'-OXYBIS-

CAS No: 000111-76-2
Name: ETHANOL, 2-BUTOXY-

CAS No: 000111-90-0
Name: ETHANOL, 2- (2-ETHOXYETHOXY)

CAS No: 000112-34-5
Name: ETHANOL, 2-(2-BUTOXYETHOXY)-

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

CAS No: 002807-30-9
Name: 2-PROPOXY ETHANOL

CAS No: 007439-92-1
Name: LEAD

CAS No: 068186-90-3
Name: CI PIGMENT BROWN 24

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

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

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

**Condition 23: Malfunctions and start-up/shutdown activities
Effective between the dates of 10/15/2013 and 10/14/2023**



Applicable State Requirement:6 NYCRR 201-1.4

Replaces Condition(s) 27

Item 23.1:

(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 24: Emission Unit Definition
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1(From Mod 3):

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

Emission Unit: 0-00001

Emission Unit Description:

New York State Department of Environmental Conservation

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001



Emission Unit 0-00001 consists of coating operations for metal reels including: Solvent Wipe Cleaning (EP 05SSA, 05SSB, 05SSC, and 05SSD) Spray Painting (EP 0003A, 0003B, 05SPA, 05SPB, 05SPC, 05SPD) Oven Curing (EP 05SO1A and exempt source 05SO1B) and Plasma Cutter (EP 05BWE).

Building(s): 15
22
5S

Condition 25: Renewal deadlines for state facility permits
Effective between the dates of 10/15/2013 and 10/14/2023

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

Item 25.1:

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 26: Compliance Demonstration
Effective between the dates of 10/15/2013 and 10/14/2023

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

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 26.2:

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 4
1130 N. Westcott Rd.
Schenectady, NY 12306

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

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Condition 5: Air pollution prohibited
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable State 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.

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

Condition 28: Emission Point Definition By Emission Unit
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 28.1(From Mod 3):

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

Emission Unit: 0-00001

Emission Point: 0003A

Height (ft.): 12 Diameter (in.): 34
NYTMN (km.): 4701.7 NYTME (km.): 578.7 Building: 15

Emission Point: 0003B

Height (ft.): 12 Diameter (in.): 34
NYTMN (km.): 4701.7 NYTME (km.): 578.7 Building: 15

Emission Point: 05S1A

Height (ft.): 20 Diameter (in.): 12
NYTMN (km.): 4707.372 NYTME (km.): 578.797 Building: 22

Emission Point: 05S1B

Height (ft.): 20 Diameter (in.): 12
NYTMN (km.): 4707.372 NYTME (km.): 578.797 Building: 22

Emission Point: 05S1C

Height (ft.): 20 Diameter (in.): 12
NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 22

Emission Point: 05S1D

Height (ft.): 20 Diameter (in.): 12



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	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 22
Emission Point:	05SPA		
	Height (ft.): 38	Diameter (in.): 34	
	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 5S
Emission Point:	05SPB		
	Height (ft.): 38	Diameter (in.): 34	
	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 5S
Emission Point:	05SPC		
	Height (ft.): 38	Diameter (in.): 34	
	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 5S
Emission Point:	05SPD		
	Height (ft.): 38	Diameter (in.): 34	
	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 5S
Emission Point:	05SSA		
	Height (ft.): 31	Diameter (in.): 24	
	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 5S
Emission Point:	05SSB		
	Height (ft.): 31	Diameter (in.): 24	
	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 5S
Emission Point:	05SSC		
	Height (ft.): 31	Diameter (in.): 24	
	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 5S
Emission Point:	05SSD		
	Height (ft.): 31	Diameter (in.): 24	
	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 5S
Emission Point:	05BWE		
	Height (ft.): 17	Diameter (in.): 16	
	NYTMN (km.): 4707.1	NYTME (km.): 578.7	Building: 5S

Condition 29: Process Definition By Emission Unit
Effective between the dates of 10/15/2013 and 10/14/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 29.1(From Mod 3):

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

Emission Unit: 0-00001
Process: 001 Source Classification Code: 4-02-020-33
Process Description:
Coating process which uses compliant coatings (i.e. coatings with less than 3.5 lbs/gal VOC content). The

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Department has previously approved the use of ICI/Devoe and Dupont Centari coating lines. This process includes Emission Sources: 0003A and 0003B (controlled by particulate filters), 05SPA, 05SPB, 05SPC, and 05SPD (controlled by water filters).

Emission Source/Control: 00S1A - Combustion

Emission Source/Control: 00S1B - Combustion

Emission Source/Control: 0003A - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0003B - Control
Control Type: FABRIC FILTER

Emission Source/Control: 05SPA - Control
Control Type: WATER CURTAIN

Emission Source/Control: 05SPB - Control
Control Type: WATER CURTAIN

Emission Source/Control: 05SPC - Control
Control Type: WATER CURTAIN

Emission Source/Control: 05SPD - Control
Control Type: WATER CURTAIN

Emission Source/Control: 0003I - Process

Emission Source/Control: 0SPAI - Process

Emission Source/Control: 0SPBI - Process

Emission Source/Control: 0SPCI - Process

Emission Source/Control: 0SPDI - Process

Item 29.2(From Mod 3):

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

Emission Unit: 0-00001

Process: 002

Source Classification Code: 4-02-020-33

Process Description:

Coating process using coatings allowed under a variance (i.e. coatings with greater than 3.5 lbs/gal VOC content). The Department has previously approved the use of ICI/Devoe and Dupont Centari coating lines. This process includes Emission Sources: 0003A and 0003B (controlled by particulate filters), 05SPA, 05SPB, 05SPC, and 05SPD (controlled by water filters).

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Emission Source/Control: 0003A - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0003B - Control
Control Type: FABRIC FILTER

Emission Source/Control: 05SPA - Control
Control Type: WATER CURTAIN

Emission Source/Control: 05SPB - Control
Control Type: WATER CURTAIN

Emission Source/Control: 05SPC - Control
Control Type: WATER CURTAIN

Emission Source/Control: 05SPD - Control
Control Type: WATER CURTAIN

Emission Source/Control: 0003I - Process

Emission Source/Control: 0SPAI - Process

Emission Source/Control: 0SPBI - Process

Emission Source/Control: 0SPCI - Process

Emission Source/Control: 0SPDI - Process

Item 29.3(From Mod 3):

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

Emission Unit: 0-00001

Process: 004

Source Classification Code: 4-02-020-33

Process Description:

Painted/coated reel curing is performed in a large convection oven that is heated by four exempt burners that can operate separately or in tandem. This oven services paint lines 0SPAI, 0SPBI, 0SPCI, and 0SPDI and exhausts through emission points 05S1A and 05S1B.

Emission Source/Control: 00S1A - Combustion

Emission Source/Control: 00S1B - Combustion

Emission Source/Control: 00S1C - Combustion

Emission Source/Control: 00S1D - Combustion

Emission Source/Control: 00SO1 - Process

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Emission Source/Control: OSPAI - Process

Emission Source/Control: OSPBI - Process

Emission Source/Control: OSPCI - Process

Emission Source/Control: OSPDI - Process

Item 29.4(From Mod 0):

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

Emission Unit: 0-00001

Process: 003

Process Description:

Solvent wipe cleaning of metal parts (including wipe cleaning of oversize reels). Oversize reel wipe cleaning is a fugitive process which exhausts inside the building.

This process includes emission points 05SSA, 05SSB, 05SSC, and 05SSD.

Emission Source/Control: 00SSA - Process

Design Capacity: 6,000 cubic feet per minute

Emission Source/Control: 00SSB - Process

Design Capacity: 6,000 cubic feet per minute

Emission Source/Control: 00SSC - Process

Design Capacity: 6,000 cubic feet per minute

Emission Source/Control: 00SSD - Process

Design Capacity: 6,000 cubic feet per minute

Item 29.5(From Mod 0):

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

Emission Unit: 0-00001

Process: 005

Process Description:

Plasma cutter is utilized to cut steel, stainless steel and aluminum.

Emission Source/Control: 05BWE - Process

Emission Source/Control: 5BWEI - Process

Item 29.6(From Mod 0):

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

Emission Unit: 0-00001

Process: 006

Process Description:

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Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001



Painted/coated reel curing is performed in a large convection oven that is heated by exempt burners that can operate separately or in tandem. This oven services paint line 0003I and exhausts through emission points 0003A and 0003B.

Emission Source/Control: 0003A - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0003B - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0003I - Process

