



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-3013-00251/00002
Effective Date: 11/08/2013 Expiration Date: 11/07/2023

Permit Issued To:ROME SPECIALTY COMPANY INC
501 WEST EMBARGO ST
ROME, NY 13440

Contact: MICHAEL A BLEEM
501 WEST EMBARGO ST
ROME, NY 13440
(315) 337-8200

Facility: ROME SPECIALTY COMPANY INC
501 WEST EMBARGO ST
ROME, NY 13440

Description:
Facility manufactures swivels for sport fishing applications. Operations at the facility include nickel, copper and black oxide plating.

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: LAWRENCE R AMBEAU
NYSDEC - STATE OFFICE BLDG
317 WASHINGTON ST
WATERTOWN, NY 13601

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 6 HEADQUARTERS



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



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

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 6 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 6 Headquarters
Division of Environmental Permits
State Office Building, 317 Washington Street
Watertown, NY 13601-3787
(315) 785-2245

New York State Department of Environmental Conservation

Permit ID: 6-3013-00251/00002

Facility DEC ID: 6301300251



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To:ROME SPECIALTY COMPANY INC
501 WEST EMBARGO ST
ROME, NY 13440

Facility: ROME SPECIALTY COMPANY INC
501 WEST EMBARGO ST
ROME, NY 13440

Authorized Activity By Standard Industrial Classification Code:
3469 - METAL STAMPINGS, NEC

Permit Effective Date: 11/08/2013

Permit Expiration Date: 11/07/2023



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-3.1 (a): Exempt and Trivial Activities Applicability
- 2 6 NYCRR 211.1: Air pollution prohibited
- 3 40CFR 63, Subpart A: General Provisions
- 4 40CFR 63, Subpart WWWW: Compliance Demonstration

Emission Unit Level

EU=1-NI001,Proc=NI1,ES=NICK1

- 5 40CFR 63.11507(a)(1), Subpart WWWW: Compliance Demonstration
- 6 40CFR 63.11507(g), Subpart WWWW: Compliance Demonstration
- 7 40CFR 63.11508(c)(1), Subpart WWWW: Wetting Agent/Fume Suppressant Initial Compliance
- 8 40CFR 63.11508(d)(1), Subpart WWWW: Operation and Maintenance of Air Pollution Equipment
- 9 40CFR 63.11508(d)(2), Subpart WWWW: Annual Compliance Certification
- 10 40CFR 63.11508(d)(3), Subpart WWWW: Compliance Demonstration
- 11 40CFR 63.11508(d)(8), Subpart WWWW: Compliance Demonstration
- 12 40CFR 63.11509(a), Subpart WWWW: Initial Notification
- 13 40CFR 63.11509(b), Subpart WWWW: Notification of Compliance Status
- 14 40CFR 63.11509(c)(1), Subpart WWWW: Wetting Agent/Fume Suppressant Annual Compliance Report
- 15 40CFR 63.11509(c)(2), Subpart WWWW: Control System Annual Compliance Report
- 16 40CFR 63.11509(c)(6), Subpart WWWW: Management Practices Annual Compliance Report
- 17 40CFR 63.11509(c)(7), Subpart WWWW: Annual Compliance Report
- 18 40CFR 63.11509(d), Subpart WWWW: Compliance Demonstration
- 19 40CFR 63.11509(e), Subpart WWWW: Compliance Demonstration
- 20 40CFR 63.11509(f), Subpart WWWW: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 21 ECL 19-0301: Contaminant List
- 22 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 23 6 NYCRR Subpart 201-5: Emission Unit Definition
- 24 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 25 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 26 6 NYCRR Subpart 201-9: Compliance Demonstration
- 27 6 NYCRR 211.2: Visible Emissions Limited

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



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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



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

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

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

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

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

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

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

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

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

Item J: Required Emission Tests - 6 NYCRR 202-1.1



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

Item K: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Exempt and Trivial Activities Applicability



Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement:6 NYCRR 201-3.1 (a)

Item 1.1:

If the facility owner and/or operator performs any of the exempt and trivial activities listed in 6 NYCRR Part 201-3.2(c) or 201-3.3(c), such activities are exempt from the permitting provisions of 6 NYCRR Part 201-5, but not from other Parts of 6 NYCRR Chapter III, or from applicable permitting requirements of local air pollution control agencies.

Condition 2: Air pollution prohibited

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement:6 NYCRR 211.1

Item 2.1:

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 3: General Provisions

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement:40CFR 63, Subpart A

Item 3.1:

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 4: Compliance Demonstration

Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement:40CFR 63, Subpart WWWW

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

63.11504 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a plating and polishing facility that is an area source of hazardous air pollutant (HAP) emissions and meets the



criteria specified in paragraphs (a)(1) through (3) of this section.

(1) A plating and polishing facility is a plant site that is engaged in one or more of the processes listed in paragraphs (a)(1)(i) through (vi) of this section.

(i) Electroplating other than chromium electroplating (i.e., non-chromium electroplating).

(ii) Electroless or non-electrolytic plating.

(iii) Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying.

(iv) Dry mechanical polishing of finished metals and formed products after plating or thermal spraying.

(v) Electroforming.

(vi) Electropolishing.

(2) A plating or polishing facility is an area source of HAP emissions, where an area source is any stationary source or group of stationary sources within a contiguous area under common control that does not have the potential to emit any single HAP at a rate of 9.07 megagrams per year (Mg/yr) (10 tons per year (tpy)) or more and any combination of HAP at a rate of 22.68 Mg/yr (25 tpy) or more.

(3) Your plating and polishing facility uses or has emissions of compounds of one or more plating and polishing metal HAP, which means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, as defined in § 63.11511, "What definitions apply to this subpart?" With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form.

63.11505 What parts of my plant does this subpart cover?

(a) This subpart applies to each new or existing affected source, as specified in paragraphs (a)(1) through (3) of this section, at all times. A new source is defined in § 63.11511, "What definitions apply to this subpart?"



(1) Each tank that contains one or more of the plating and polishing metal HAP, as defined in § 63.11511, “What definitions apply to this subpart?”, and is used for non-chromium electroplating; electroforming; electropolishing; electroless plating or other non-electrolytic metal coating operations, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

63.11508 What are my compliance requirements?

(a) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with § 63.11509(b) of “What are my notification, reporting, and recordkeeping requirements?”

(b) You must be in compliance with the applicable management practices and equipment standards in this subpart at all times.

63.11510 What General Provisions apply to this subpart?

If you own or operate a new or existing affected source, you must comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 1 of this subpart.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 5: Compliance Demonstration
Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 40CFR 63.11507(a)(1), Subpart
WWWWW

Item 5.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-NI001
Process: NII

Emission Source: NICK1



Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For an affected new or existing non-cyanide electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and operates at a pH of less than 12, a wetting agent/fume suppressant, as defined in 40CFR 63.11511, must be used in the bath of the affected tank according to paragraphs (i) through (iii).

(i) Initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process.

(ii) Add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.

(iii) If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this rule.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 6: Compliance Demonstration
Effective between the dates of 11/08/2013 and 11/07/2023

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

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-NI001

Process: NII

Emission Source: NICK1

Item 6.2:

Compliance Demonstration shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP must implement the applicable management practices in paragraphs (1) through (12), as practicable.

- (1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- (2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- (3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- (4) Use tank covers, if already owned and available at the facility, whenever practicable.
- (5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- (6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- (7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- (8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- (9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- (10) Minimize spills and overflow of tanks, as practicable.



(11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.

(12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

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 7: Wetting Agent/Fume Suppressant Initial Compliance
Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement:40CFR 63.11508(c)(1), Subpart

WWWWWW

Item 7.1:

This Condition applies to Emission Unit: 1-NI001

Process: NII

Emission Source: NICK1

Item 7.2:

The owner or operator of an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in 40CFR 63.11507(a) and uses a wetting agent/fume suppressant to comply with 40CFR 63 WWWWWW, must demonstrate initial compliance according to paragraphs (i) through (iv).

(i) The owner or operator must add wetting agent/fume suppressant to the bath of each affected tank according to manufacturer's specifications and instructions.

(ii) The owner or operator must state in his/her Notification of Compliance Status that he/she adds wetting agent/fume suppressant to the bath according to manufacturer's specifications and instructions.

(iii) The owner or operator must implement the applicable management practices specified in 40CFR 63.11507(g), as practicable.

(iv) The owner or operator must state in the Notification of Compliance Status that he/she has implemented the applicable management practices specified in 40CFR 63.11507(g), as practicable.

Condition 8: Operation and Maintenance of Air Pollution Equipment
Effective between the dates of 11/08/2013 and 11/07/2023



**Applicable Federal Requirement:40CFR 63.11508(d)(1), Subpart
WWWWWW**

Item 8.1:

This Condition applies to Emission Unit: 1-NI001
Process: NI1 Emission Source: NICK1

Item 8.2:

The owner or operator must always operate and maintain the affected source, including air pollution control equipment.

**Condition 9: Annual Compliance Certification
Effective between the dates of 11/08/2013 and 11/07/2023**

**Applicable Federal Requirement:40CFR 63.11508(d)(2), Subpart
WWWWWW**

Item 9.1:

This Condition applies to Emission Unit: 1-NI001
Process: NI1 Emission Source: NICK1

Item 9.2:

The owner or operator must prepare an annual compliance certification according to the requirements specified in 40 CFR 63.11509(c), "Notification, Reporting, and Recordkeeping," and keep it in a readily-accessible location for inspector review.

**Condition 10: Compliance Demonstration
Effective between the dates of 11/08/2013 and 11/07/2023**

**Applicable Federal Requirement:40CFR 63.11508(d)(3), Subpart
WWWWWW**

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-NI001
Process: NI1 Emission Source: NICK1

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in 40CFR 63.11507(a) and uses a wetting agent/fume suppressant to comply with 40CFR 63 WWWWWW must demonstrate continuous compliance according to paragraphs (i) through (iii).

(i) The owner or operator must record that he/she has



added the wetting agent/fume suppressant to the tank bath in the original make-up of the tank.

(ii) For tanks where the wetting agent/fume suppressant is a separate purchased ingredient from the other tank additives, the owner or operator must demonstrate continuous compliance according to paragraphs (A) and (B).

(A) The owner or operator must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.

(B) The owner or operator must record each addition of wetting agent/fume suppressant to the tank bath.

(iii) The owner or operator must state in his/her annual compliance certification that he/she has added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 11: Compliance Demonstration
Effective between the dates of 11/08/2013 and 11/07/2023

Applicable Federal Requirement: 40CFR 63.11508(d)(8), Subpart
WWWWWW

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-NI001

Process: NI1

Emission Source: NICK1

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected tank or other operation that is subject to the management practices specified in 40CFR 63.11507(g) must demonstrate continuous compliance according to paragraphs (i) and (ii).

(i) The owner or operator must implement the applicable

New York State Department of Environmental Conservation

Permit ID: 6-3013-00251/00002

Facility DEC ID: 6301300251



management practices during all times that the affected tank or process is in operation.

(ii) The owner or operator must state in his/her annual compliance certification that he/she has implemented the applicable management practices, as practicable.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 12: Initial Notification
Effective between the dates of 11/08/2013 and 11/07/2023

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

Item 12.1:

This Condition applies to Emission Unit: 1-NI001

Process: NI1

Emission Source: NICK1

Item 12.2:

The owner or operator of an affected source, as defined in 40CFR 63.11505(a) must submit an Initial Notification in accordance with paragraphs (1) through (4) by the dates specified.

(1) The Initial Notification must include the information specified in 40CFR 63.9(b)(2)(i) through (iv) of the General Provisions.

(2) The Initial Notification must include a description of the compliance method (e.g., use of wetting agent/fume suppressant) for each affected source.

(3) If the owner or operator starts up his/her affected source on or before July 1, 2008, he/she must submit an Initial Notification not later than 120 calendar days after July 1, 2008.

(4) If the owner or operator starts up his/her new affected source after July 1, 2008, he/she must submit an Initial Notification not later than 120 calendar days after facility becomes subject to 40CFR 63 WWWWWW.

Condition 13: Notification of Compliance Status
Effective between the dates of 11/08/2013 and 11/07/2023

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

Item 13.1:

This Condition applies to Emission Unit: 1-NI001

Process: NI1

Emission Source: NICK1

Item 13.2:

New York State Department of Environmental Conservation

Permit ID: 6-3013-00251/00002

Facility DEC ID: 6301300251



The owner or operator of an affected source must submit a Notification of Compliance Status in accordance with paragraphs (1) and (2).

(1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in 40CFR 63.11506.

(2) The Notification of Compliance Status must include the items specified in paragraphs (i) through (iv).

(i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.

(ii) Methods used to comply with the applicable management practices and equipment standards.

(iii) Description of the capture and emission control systems used to comply with the applicable equipment standards.

(iv) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements.

**Condition 14: Wetting Agent/Fume Suppressant Annual Compliance Report
Effective between the dates of 11/08/2013 and 11/07/2023**

Applicable Federal Requirement:40CFR 63.11509(c)(1), Subpart

WWWWWW

Item 14.1:

This Condition applies to Emission Unit: 1-NI001

Process: NI1

Emission Source: NICK1

Item 14.2:

The owner or operator of an affected electroplating, electroforming, or electropolishing tank that is subject to the requirements in 40CFR 63.11507(a)(1) must state in his/her annual compliance certification that he/she has added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

**Condition 15: Control System Annual Compliance Report
Effective between the dates of 11/08/2013 and 11/07/2023**

Applicable Federal Requirement:40CFR 63.11509(c)(2), Subpart

WWWWWW

Item 15.1:

This Condition applies to Emission Unit: 1-NI001

Process: NI1

Emission Source: NICK1

Item 15.2:



The owner or operator of any one of the affected sources listed in paragraphs (i) through (iii) must state in his/her annual certification that he/she has operated and maintained the control system according to the manufacturer's specifications and instructions.

(i) Electroplating, electroforming, or electropolishing tank that is subject to the requirements in 40CFR 63.11507(a) and uses a control system to comply with 40CFR 63 WWWWWW;

(ii) Dry mechanical polishing operation that is subject to 40CFR 63.11507(e); or

(iii) Permanent thermal spraying operation that is subject to 40CFR 63.11507(f)(1) or (2).

**Condition 16: Management Practices Annual Compliance Report
Effective between the dates of 11/08/2013 and 11/07/2023**

**Applicable Federal Requirement:40CFR 63.11509(c)(6), Subpart
WWWWW**

Item 16.1:

This Condition applies to Emission Unit: 1-NI001
Process: NI1 Emission Source: NICK1

Item 16.2:

The owner or operator of an affected tank that is subject to the management practices specified in 40CFR 63.11507(g) must state in his/her annual compliance certification that he/she has implemented the applicable management practices, as practicable.

**Condition 17: Annual Compliance Report
Effective between the dates of 11/08/2013 and 11/07/2023**

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

Item 17.1:

This Condition applies to Emission Unit: 1-NI001
Process: NI1 Emission Source: NICK1

Item 17.2:

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



Condition 18: Compliance Demonstration
Effective between the dates of 11/08/2013 and 11/07/2023

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

Item 18.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-NI001
Process: NII Emission Source: NICK1

Item 18.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any deviations from the compliance requirements specified in 40CFR 63 WWWWWW which occurred at an affected source during the year, must reported by the owner or operator, along with the corrective action taken, and submit this report to the delegated authority.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 19: Compliance Demonstration
Effective between the dates of 11/08/2013 and 11/07/2023

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

Item 19.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-NI001
Process: NII Emission Source: NICK1

Item 19.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must keep the records specified in paragraphs (1) through (3).

(1) A copy of any Initial Notification and Notification of

New York State Department of Environmental Conservation

Permit ID: 6-3013-00251/00002

Facility DEC ID: 6301300251



Compliance Status that was submitted and all documentation supporting those notifications.

(2) The records specified in 40CFR 63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions.

(3) The records required to show continuous compliance with each management practice and equipment standard that applies to the owner or operator, as specified in 40CFR 63.11508(d).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 20: Compliance Demonstration
Effective between the dates of 11/08/2013 and 11/07/2023

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

WWWWW

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-NI001

Process: NII

Emission Source: NICK1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. He/she must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40CFR 63.10(b)(1). He/she may keep the records offsite for the remaining 3 years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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

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

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 21: Contaminant List
Effective between the dates of 11/08/2013 and 11/07/2023



Applicable State Requirement:ECL 19-0301

Item 21.1:

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

CAS No: 007440-02-0

Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 0NY100-00-0

Name: TOTAL HAP

**Condition 22: Malfunctions and start-up/shutdown activities
Effective between the dates of 11/08/2013 and 11/07/2023**

Applicable State Requirement:6 NYCRR 201-1.4

Item 22.1:

(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

New York State Department of Environmental Conservation

Permit ID: 6-3013-00251/00002

Facility DEC ID: 6301300251



such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 23: Emission Unit Definition
Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 23.1:

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

Emission Unit: 1-CU001

Emission Unit Description:

The copper electroplating line is not vented, no emission point is associated with this Emission Unit (calculations assume emissions are vented through the nickel emission point).

Building(s): MAIN

Item 23.2:

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

Emission Unit: 1-NI001

Emission Unit Description:

Nickel electroplating line; parts are submerged in an electroplating nickel bath and then submerged in three successive water rinse tanks. This process is vented through an exhaust system to a roof mounted fan.

Building(s): MAIN

Condition 24: Renewal deadlines for state facility permits
Effective between the dates of 11/08/2013 and 11/07/2023

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

Item 24.1:

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 25: Compliance Demonstration
Effective between the dates of 11/08/2013 and 11/07/2023

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

Item 25.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 25.2:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 6-3013-00251/00002

Facility DEC ID: 6301300251



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 6
State Office Building
317 Washington Ave.
Watertown, NY 13601

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 26: Compliance Demonstration
Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement:6 NYCRR Subpart 201-9

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities emission rates exceed the 201-9 table of Significant Mass Rates for Persistent, Bioaccumulative and Toxic compounds for Nickel compounds making them subject to 201-5.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27: Visible Emissions Limited
Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement:6 NYCRR 211.2

Item 27.1:

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



**** Emission Unit Level ****

Condition 28: Emission Point Definition By Emission Unit
Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 28.1:

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

Emission Unit: 1-NI001

Emission Point: 00001

Height (ft.): 30

Diameter (in.): 14

NYTMN (km.): 4785.172 NYTME (km.): 462.3 Building: MAIN

Condition 29: Process Definition By Emission Unit
Effective between the dates of 11/08/2013 and 11/07/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 29.1:

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

Emission Unit: 1-CU001

Process: CU1

Source Classification Code: 3-09-010-04

Emission Source/Control: COP01 - Process

Item 29.2:

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

Emission Unit: 1-NI001

Process: NI1

Source Classification Code: 3-09-010-03

Emission Source/Control: NICK1 - Process

