

Facility DEC ID: 6307000035

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-3070-00035/00045
Mod 0 Effective Date: 02/02/2015 Expiration Date: 02/01/2025
Mod 1 Effective Date: 12/21/2021 Expiration Date: 02/01/2025

Permit Issued To: TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
8273 HALSEY RD
WHITESBORO, NY 13492

Facility: TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
8273 Halsey Rd
Whitesboro, NY 13492

Contact: MICHAEL COLLINS
TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
8273 HALSEY RD
WHITESBORO, NY 13492
(315) 768-8754

Description:
This project consists of the modification of an existing Air State Facility Permit.

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: TERRY R TYOE
NYSDEC - UTICA SUBOFFICE
207 GENESEE ST
UTICA, NY 13501-2885

Authorized Signature: _____ Date: ___ / ___ / ___

Facility DEC ID: 6307000035

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.

Facility DEC ID: 6307000035

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 4 1 Facility Inspection by the Department
- 4 2 Relationship of this Permit to Other Department Orders and Determinations
- 4 3 Applications for permit renewals, modifications and transfers
- 5 4 Applications for permit renewals, modifications and transfers
- 5 5 Permit modifications, suspensions or revocations by the Department

Facility Level

- 5 6 Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA

Facility DEC ID: 6307000035

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 1-1: Applications for permit renewals, modifications and transfers

Facility DEC ID: 6307000035

Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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 1-1.2:

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

Item 1-1.3

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 6 SUBOFFICE - UTICA

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 Sub-office
 Division of Environmental Permits
 State Office Building, 207 Genesee Street
 Utica, NY 13501-2885
 (315) 793-2555

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
8273 HALSEY RD
WHITESBORO, NY 13492

Facility: TURBINE ENGINES COMPONENTS TECHNOLOGIES-UTICA CORP
8273 Halsey Rd
Whitesboro, NY 13492

Authorized Activity By Standard Industrial Classification Code:
3463 - NONFERROUS FORGINGS
3511 - TURBINES AND TURBINE GENERATOR
3724 - AIRCRAFT ENGINES & ENGINE PART

Mod 0 Permit Effective Date: 02/02/2015

Permit Expiration Date: 02/01/2025

Mod 1 Permit Effective Date: 12/21/2021

Permit Expiration Date: 02/01/2025

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 7 1 6 NYCRR 201-3.3 (c): Trivial Activities - (c)(52)
- 7 2 6 NYCRR 201-3.3 (c): Trivial Activities: (c)(53)
- 7 3 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- 7 *1-1 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 9 24 6 NYCRR 211.2: Visible Emissions Limited
- 10 1-2 6 NYCRR 212-1.5 (g): Compliance Demonstration
- 10 1-3 6 NYCRR 212-1.5 (g): Compliance Demonstration
- 11 1-4 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 13 1-5 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 14 9 6 NYCRR 228-1.1 (a) (3): Once in always in
- 14 1-6 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 16 11 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 18 1-7 6 NYCRR 228-1.3 (e) (2): Compliance Demonstration
- 18 1-8 6 NYCRR 228-1.4 (b) (4) (ii): Compliance Demonstration
- 19 14 6 NYCRR 228-1.4 (e) (3): Class E coating line - Aerospace coatings
- 19 1-9 40CFR 63.11173(e)(2), Subpart HHHHHH: General requirements
- 20 1-10 40CFR 63.11173(e)(3), Subpart HHHHHH: HVLP Spray Gun Requirement
- 21 1-11 40CFR 63.11173(e)(4), Subpart HHHHHH: Spray Gun Cleaning
- 21 1-12 40CFR 63.11173(f)(2), Subpart HHHHHH: Compliance Demonstration

Emission Unit Level

- 22 1-13 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

EU=1-SPRAY

- 22 1-14 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 25 19 ECL 19-0301: Contaminant List
- 26 1-15 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 27 21 6 NYCRR Subpart 201-5: Emission Unit Definition
- 28 22 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 28 1-16 6 NYCRR 201-5.3 (c): CLCPA Applicability
- 29 1-17 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 29 23 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 30 5 6 NYCRR 211.1: Air pollution prohibited
- 30 1-18 6 NYCRR 211.1: Compliance Demonstration

Emission Unit Level

- 31 27 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 32 28 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/Mod 1/FINAL

**** 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.

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

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

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

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

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

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: Trivial Activities - (c)(52)
Effective between the dates of 02/02/2015 and 02/01/2025

Applicable Federal Requirement:6 NYCRR 201-3.3 (c)

Item 1.1:

The following activity is trivial and is exempt from permitting requirements and does not need to be included in the Title V facility permit application: Hand held or manually operated equipment used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, sand blasting or turning ceramic art work, ceramic precision parts, leather, metal parts, plastics, fiberboard, masonry, carbon, glass, graphite, wood or rubber.

Condition 2: Trivial Activities: (c)(53)
Effective between the dates of 02/02/2015 and 02/01/2025

Applicable Federal Requirement:6 NYCRR 201-3.3 (c)

Item 2.1:

The following activity is trivial and is exempt from permitting requirements and does not need to be included in the Title V facility permit application: Manual surface coating/painting processes which exclusively use brushed, rollers or aerosol cans.

Condition 3: Facility Permissible Emissions
Effective between the dates of 02/02/2015 and 02/01/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 3.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following
 Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0 (From Mod 1) PTE: 98,000 pounds
 per year
 Name: VOC

Condition 1-1: Capping Monitoring Condition
Effective between the dates of 12/21/2021 and 02/01/2025

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 1-1.1:

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 201-6.1 (a)

Item 1-1.2:

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

Item 1-1.3:

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 1-1.4:

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 1-1.5:

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 1-1.6:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: 1-SPRAY

Emission Unit: 2-ACIDS

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

Item 1-1.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:
CAP:

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Facility owner shall ensure that the facility-wide emissions of volatile organic compounds (VOC), including those from permitted, exempt and trivial sources, remain less than 98,000 pounds during any consecutive 365 day period. This 98,000 pound VOC cap enables TECT to avoid the applicability of 6 NYCRR 228-1 on aerospace blades, however TECT must comply with Part 228-1.3 (General Requirements). On land-based blades (Misc Metal Parts category), TECT is still held to the 3.5 lbs/gal VOC content limit.

RECORDS:

Facility owner shall maintain records that verify the facility's monthly VOC emissions. These records shall be maintained at the facility for a minimum five year period. Reports will be submitted annually, in a format acceptable to the Department, which document that the facility's VOC emissions during any consecutive 365 day period were less than 98,000 pounds.

REPORTS:

The annual monitoring report shall include information that documents the VOC emissions from each emission source at the facility, including exempt and trivial activities.

The report shall also include all emission factors and other data used in calculating the monthly VOC emissions.

The form "Annual Capping Certification" is required.

NONCOMPLIANCE:

Any noncompliance with the VOC emission limit in this condition must be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: VOC

Upper Permit Limit: 98,000 pounds per year

Reference Test Method: EPA Reference Method 25A

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 1/30/2022.

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

Condition 24: Visible Emissions Limited
Effective between the dates of 02/02/2015 and 02/01/2025

Applicable Federal Requirement:6 NYCRR 211.2**Item 24.1:**

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.

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Emission Unit: 2-ACIDS	Emission Point: 00053
Emission Unit: 2-ACIDS	Emission Point: 00054
Emission Unit: 2-ACIDS	Emission Point: 00056
Emission Unit: 2-ACIDS	Emission Point: 0055A
Emission Unit: 3-MANUF	Emission Point: 00004
Emission Unit: 3-MANUF	Emission Point: 00013
Emission Unit: 3-MANUF	Emission Point: 00059

Regulated Contaminant(s):
 CAS No: 0NY075-00-5 PM-10

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any process emission source subject to 6 NYCRR 212. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Compliance with the 20% opacity standard shall be estimated (in surrogate) by the permittee's weekly observation of the outlet of the emission source to determine whether or not visible emissions are present and/or to what extent, similar to EPA Reference Method 22. Visible emission observations shall not consider those due to water vapor that may be present in exhaust gas. Observations shall made once per week and while the source is operating. These observations shall be recorded in a log book and made available to the Department upon request.

If visible emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified Method 9 visible emission test
- 3) Notify the NYSDEC
- 4) If the Method 9 test determines that the opacity is less than 20%, then an appropriate log entry of "clear" or "very minimal" shall be recorded.

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

- 5) If the RM9 certified observer detects opacity greater than 20%, then facility shall make such an entry in the log.
- 6) Severe weather conditions may impede meaningful observations

Parameter Monitored: OPACITY
 Upper Permit Limit: 20 percent
 Reference Test Method: Observe plume weekly, perform RM 9 at DEC request
 Monitoring Frequency: WEEKLY
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2022.
 Subsequent reports are due every 12 calendar month(s).

Condition 1-5: Compliance Demonstration
Effective between the dates of 12/21/2021 and 02/01/2025

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

Item 1-5.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: 2-ACIDS	Emission Point: 00003
Emission Unit: 2-ACIDS	Emission Point: 00043
Emission Unit: 2-ACIDS	Emission Point: 00052
Emission Unit: 2-ACIDS	Emission Point: 00053
Emission Unit: 2-ACIDS	Emission Point: 00054
Emission Unit: 2-ACIDS	Emission Point: 00056
Emission Unit: 2-ACIDS	Emission Point: 0055A
Emission Unit: 3-MANUF	Emission Point: 00004
Emission Unit: 3-MANUF	Emission Point: 00013
Emission Unit: 3-MANUF	Emission Point: 00059
Regulated Contaminant(s):	
CAS No: 0NY075-00-0	PARTICULATES

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
 Monitoring Description:

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

As per 212-1.7(a) 'Sampling and monitoring' section, facility owners and/or operators of a process emission source required by the department to demonstrate compliance with this Part may be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to Part 202 of this Title using EPA Test Reference Method 5.

Parameter Monitored: PM-10

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: USEPA Reference Test Method 5

Monitoring Frequency: Once every five years

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Once in always in
Effective between the dates of 02/02/2015 and 02/01/2025

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

Item 9.1:

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 1-6: Compliance Demonstration
Effective between the dates of 12/21/2021 and 02/01/2025

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

Item 1-6.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: 1-SPRAY Emission Point: 00040

Emission Unit: 1-SPRAY Emission Point: 00057

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Emission Unit: 1-SPRAY

Emission Point: 00058

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, excepting only the emission of uncombined water, in this case - the emission points (stacks) for a coating operation. The permittee shall conduct WEEKLY observations of visible emissions on the emission points to which this condition applies. These observations shall 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 Annual Monitoring

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Report required of all permittees shall include a copy of this log.

**** 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

Reference Test Method: Observe plume weekly, perform RM 9 at DEC request

Monitoring Frequency: WEEKLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

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

Condition 11: Compliance Demonstration
Effective between the dates of 02/02/2015 and 02/01/2025

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

Item 11.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-SPRAY

Process: 102

Emission Unit: 1-SPRAY

Process: SPR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Subpart must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

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

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

(g) clean hand held spray guns by one of the following:

- (1) an enclosed spray gun cleaning system that is kept closed when not in use;
- (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
- (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
- (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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

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

Monitoring Frequency: WEEKLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2016.
 Subsequent reports are due every 12 calendar month(s).

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Condition 1-7: Compliance Demonstration
Effective between the dates of 12/21/2021 and 02/01/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (e) (2)

Item 1-7.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: 1-SPRAY

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

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

A facility containing a coating line (other than a class A coating line) may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4 ; provided such use is recorded on an as-used basis and such record is maintained at the facility for a period of five years. If this usage occurs, facility is required to report the coating-usage details in the next Annual Monitoring Report.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 55 gallons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-8: Compliance Demonstration
Effective between the dates of 12/21/2021 and 02/01/2025

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

Item 1-8.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: 1-SPRAY
 Process: SPR

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

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The VOC content of coatings that are applied to land-based blades is limited to 3.5 pounds of VOC per gallon of coating less water and less exempt VOC. Land based blades fall into the category "Class B Coating Line - Miscellaneous Metal Parts" and Table B4 dictates that 3.5 lbs/gal is the regulatory limit for "Pretreatment Coatings" that are either air dried or bake dried.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: EPA Reference Method 24, if requested by NYSDEC

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Class E coating line - Aerospace coatings
Effective between the dates of 02/02/2015 and 02/01/2025

Applicable Federal Requirement:6 NYCRR 228-1.4 (e) (3)

Item 14.1: Aerospace coatings which are utilized for pretreatment, adhesive bonding primers, flight testing, fuel tanks, electric/radiation effects, space vehicles and temporary mechanical maskant/high temperature heat treatment are not subject to the VOC limits of section 6 NYCRR 228-1.4(e).

Condition 1-9: General requirements
Effective between the dates of 12/21/2021 and 02/01/2025

Applicable Federal Requirement:40CFR 63.11173(e)(2), Subpart HHHHHH

Item 1-9.1:

This Condition applies to:

Emission Unit: 1SPRAY

Process: 208

Emission Source: BTH#4

Item 1-9.2:

All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

- (i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see § 63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
- (ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.
- (iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
- (iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

Condition 1-10: HVLP Spray Gun Requirement

Effective between the dates of 12/21/2021 and 02/01/2025

Applicable Federal Requirement: 40CFR 63.11173(e)(3), Subpart HHHHHH

Item 1-10.1:

This Condition applies to:

Emission Unit: 1SPRAY

Process: 208

Emission Source: BTH#4

Item 1-10.2:

All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Guns, September 26, 2002” The requirements of this condition do not apply to painting performed by students and instructors at paint training centers. The requirements of this condition do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

Condition 1-11: Spray Gun Cleaning
Effective between the dates of 12/21/2021 and 02/01/2025

Applicable Federal Requirement:40CFR 63.11173(e)(4), Subpart HHHHHH

Item 1-11.1:

This Condition applies to:

Emission Unit: 1SPRAY

Process: 208

Emission Source: BTH#4

Item 1-11.2:

All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

Condition 1-12: Compliance Demonstration
Effective between the dates of 12/21/2021 and 02/01/2025

Applicable Federal Requirement:40CFR 63.11173(f)(2), Subpart HHHHHH

Item 1-12.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-SPRAY

Process: 208

Emission Source: BTH#4

Regulated Contaminant(s):

CAS No: 007789-06-2

STRONTIUM CHROMATE

Item 1-12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

TECT shall become familiar with and retain familiarity with 40 CFR 63.11173(f)(2) which embodies (i)(ii)(iii) and (iv). This Regulation calls for (among several other

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

topics) a mandated and recorded curriculum for painter training. The TECT spray paint booth (Source BTH#4) is robotic and hence - no human painter exists. Nonetheless, it is required that the programming for this spray gun shall follow the dictates of this Regulation. In essence, the observable movements of this spray gun shall mimic the logic of 63.11173(f)(2)(i) and 63.11173(f)(2)(ii). Facility shall maintain readiness to demonstrate and/or defend that this robot is performing to this end.

Monitoring Frequency: MINIMUM - ONCE PER CALENDAR YEAR
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 1-13: Emission Unit Permissible Emissions
Effective between the dates of 12/21/2021 and 02/01/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-13.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 1-SPRAY

CAS No: 0NY998000 (From Mod 1)

Name: VOC

PTE(s): 49,000 pounds per year

5.6 pounds per hour

Condition 1-14: Compliance Demonstration
Effective between the dates of 12/21/2021 and 02/01/2025

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

Item 1-14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SPRAY

Item 1-14.2:

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:

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

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

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

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 in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction 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.

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

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 19: Contaminant List

Effective between the dates of 02/02/2015 and 02/01/2025

Applicable State Requirement:ECL 19-0301

Item 19.1:

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

CAS No: 007647-01-0
Name: HYDROGEN CHLORIDE

CAS No: 007664-39-3
Name: HYDROGEN FLUORIDE

CAS No: 007697-37-2
Name: NITRIC ACID

CAS No: 007789-06-2
Name: STRONTIUM CHROMATE

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

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

CAS No: 0NY075-00-5
Name: PM-10

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

Condition 1-15: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 12/21/2021 and 02/01/2025

Applicable State Requirement: 6 NYCRR 201-1.4

Item 1-15.1:

- (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 maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, 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 monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.
- (c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall 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. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. 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, the air contaminants emitted, and the resulting emission rates and/or opacity.
- (d) The department may also require the facility 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.

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Condition 21: Emission Unit Definition
Effective between the dates of 02/02/2015 and 02/01/2025**Applicable State Requirement:6 NYCRR Subpart 201-5****Item 21.1(From Mod 1):**

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

Emission Unit: 1-SPRAY

Emission Unit Description:

This emission unit consists of three spray painting booths and one dip-coating bench. All painting is performed by robots and workpieces (turbine blades/MLEs of different configurations) are streamed through (hanging from an above from a conveyor chain) these booths. Maskant coatings are applied in two of the booths and an aerospace primer is applied in another booth. Blades are predominantly for aerospace turbine engines and other land-based turbine blades are manufactured as well. Booths utilize particulate filters that are 95% efficient (DRE is >98% for FTR04). Dip coating of small numbers of blades is performed by hand and done on a benchtop. Involved Processes 102 and SPR are for maskants and Process 208 is for the primer application operation.

Building(s): Main

Item 21.2(From Mod 1):

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

Emission Unit: 2-ACIDS

Emission Unit Description:

This emission unit consists of seven acid-etching operations. Involved processes: 202, 203, 204, 205, 206, 207 and 256.

-Blue Etch Anodizing Line: Packed bed scrubber @ 98% thru EP00052. Other emissions elute thru EP00054

-Virgo Etch Operation: VanAire Scrubber @ 98% thru EP00052. Other emissions elute thru EP00043 & EP00053

-Final Audit Etch: Sly Scrubber @ 70% thru EP00003

The following Chemical Milling Lines are jointly controlled by one Van Aire packed-bed scrubber and they elute through EP 0055A:

-Old Chemical Milling Line

-New Chemical Milling Line

- Manual/Small Chemical Milling Line

-Turco Etch Line (MLEs): Controlled by VanAire packed-bed

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

scrubber @ 99%, elute thru EP 00056

Emissions of hydrogen fluoride have been screened with AERSCREEN in December 2021. Two emission points (portions of Virgo, portions of Blue Etch and New, Old & Manual Milling Lines) emit hydrogen fluoride and both have been equipped with packed-bed scrubbers that attain at least 98% DRE. AERSCREEN results indicate that the scaled annual maximum is <53% of AGC at a downrange distance of 77 meters. AGC for hydrogen fluoride is 0.071 micrograms per cubic meter.

Building(s): Main

Item 21.3(From Mod 1):

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

Emission Unit: 3-MANUF

Emission Unit Description:

This emission unit consists of Electro Discharge Machining (EDM) machining operations which emit graphite particulates.

-Process 301 is EDM machining, no control, EP00004

-Process 305 is a group of Robodrill Machining Centers (cut blocks of graphite into smaller EDM electrodes). Controlled by Camfil cartridge dust collector, EP 00059

-Process 304 is the cutting of bar stock (Savage Saw), controlled by Rotoclone #6, EP00013 (this saw is unrelated to EDM operations, but it is located nearby).

NOTE: 40 CFR 63-Subpart WWWW does not apply to TECT. While TECT does abrasive-grind nickel parts, this 6W applies to the polishing operations of previously electroplated (parts that were plated with a target HAP).

Building(s): Main

Condition 22: Renewal deadlines for state facility permits
Effective between the dates of 02/02/2015 and 02/01/2025

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

Item 22.1:

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 1-16: CLCPA Applicability
Effective between the dates of 12/21/2021 and 02/01/2025

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

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

Item 1-16.1:

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

Condition 1-17: Compliance Demonstration
Effective between the dates of 12/21/2021 and 02/01/2025

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

Item 1-17.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-17.2:

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 23: Compliance Demonstration
Effective between the dates of 02/02/2015 and 02/01/2025

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

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 23.2:

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:

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Division of Air Resources
 NYS Dept. of Environmental Conservation
 Region 6
 State Office Building
 317 Washington Ave.
 Watertown, NY 13601

Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2016.
 Subsequent reports are due every 12 calendar month(s).

Condition 5: Air pollution prohibited
Effective between the dates of 02/02/2015 and 02/01/2025

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.

Condition 1-18: Compliance Demonstration
Effective between the dates of 12/21/2021 and 02/01/2025

Applicable State Requirement:6 NYCRR 211.1

Item 1-18.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint phone line available 24 hours a day, 7 days a week; the employment of an answering machine is acceptable.
2. Investigate any possible causes of any complaint received.

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and action taken.
5. Each Annual Monitoring Report shall indicate the status of this log, in a format acceptable to the Department. Facility shall report the number of complaints (even if zero) that have been logged throughout the reporting period.

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 1/30/2022.
 Subsequent reports are due every 12 calendar month(s).

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

**Condition 27: Emission Point Definition By Emission Unit
 Effective between the dates of 02/02/2015 and 02/01/2025**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 27.1(From Mod 1):

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

Emission Unit: 1-SPRAY

Emission Point: 00040
 Height (ft.): 28 Diameter (in.): 39
 NYTMN (km.): 4772.899 NYTME (km.): 472.518 Building: Main

Emission Point: 00057
 Height (ft.): 21 Diameter (in.): 14
 NYTMN (km.): 4772.87 NYTME (km.): 472.471 Building: Main

Emission Point: 00058
 Height (ft.): 21 Diameter (in.): 14
 NYTMN (km.): 4772.87 NYTME (km.): 472.449 Building: Main

Item 27.2(From Mod 1):

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

Emission Unit: 2-ACIDS

Emission Point: 00003
 Height (ft.): 36 Diameter (in.): 20
 NYTMN (km.): 4772.882 NYTME (km.): 472.468 Building: Main

Emission Point: 00043

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

Height (ft.): 26	Diameter (in.): 31	
NYTMN (km.): 4772.917	NYTME (km.): 472.535	Building: Main
Emission Point: 00052		
Height (ft.): 25	Diameter (in.): 35	
NYTMN (km.): 4772.87	NYTME (km.): 472.58	Building: Main
Emission Point: 00053		
Height (ft.): 26	Diameter (in.): 31	
NYTMN (km.): 4772.914	NYTME (km.): 472.54	Building: Main
Emission Point: 00054		
Height (ft.): 29	Length (in.): 18	Width (in.): 14
NYTMN (km.): 4772.901	NYTME (km.): 472.559	Building: Main
Emission Point: 00056		
Height (ft.): 34	Diameter (in.): 12	
NYTMN (km.): 4772.87	NYTME (km.): 472.471	Building: Main
Emission Point: 0055A		
Height (ft.): 22	Diameter (in.): 38	
NYTMN (km.): 4772.869	NYTME (km.): 472.584	Building: Main

Item 27.3(From Mod 1):

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

Emission Unit: 3-MANUF

Emission Point: 00004		
Height (ft.): 36	Diameter (in.): 16	
NYTMN (km.): 4772.911	NYTME (km.): 472.468	Building: Main
Emission Point: 00013		
Height (ft.): 24	Diameter (in.): 9	
NYTMN (km.): 4772.924	NYTME (km.): 472.514	Building: Main
Emission Point: 00059		
Height (ft.): 21	Length (in.): 22	Width (in.): 13
NYTMN (km.): 4772.901	NYTME (km.): 472.494	Building: Main

Condition 28: Process Definition By Emission Unit

Effective between the dates of 02/02/2015 and 02/01/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 28.1(From Mod 1):

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

Emission Unit: 1-SPRAY
 Process: 102 Source Classification Code: 3-09-011-99
 Process Description:
 This process consists of the "maskant for chemical processing" coating of "aerospace" (aircraft jet engine

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

ONLY) turbine blades. Such coating is performed in two spray booths and on one dip-coating bench. Robots apply these maskants in the spray booths and dip-coating is done by hand. Per 6 NYCRR 228-1.4(e)(3), these aerospace coatings are not subject to the VOC limits of Table E. Facility shall maintain records which conclusively differentiate aerospace turbine blades from land-based blades and shall maintain constant readiness to produce such a record to NYSDEC at any time.

Emission Source/Control: FTR01 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: BTH#2 - Process

Emission Source/Control: BTH#3 - Process

Emission Source/Control: DIPBH - Process

Item 28.2(From Mod 1):

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

Emission Unit: 1-SPRAY
Process: 208 Source Classification Code: 4-02-006-01

Process Description:

This process consists of the robotic spray surface coating of Metal Leading Edges (MLE) that are conveyed through the spray booth while suspended from a conveyor. The mating surface is primed with a coating that contains strontium chromate VI. Spray booth is controlled by fabric filters. MLEs dry in curing cabinets that have ducted air pickups. Elutes through emission points 00057 and 00058.

Emission Source/Control: FTR04 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: BTH#4 - Process

Emission Source/Control: CUR04 - Process

Item 28.3(From Mod 1):

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

Emission Unit: 1-SPRAY
Process: SPR Source Classification Code: 4-02-001-01

Process Description:

This process consists of the maskant coating of "land-based" turbine blades. Land-based blades shall constitute ALL turbine blades that are not produced for aerospace (aircraft) usage. Such coating is performed in two spray booths and on one dip-coating bench. Robots spray the maskants in the spray booths and dip-coating is done by hand. The usage of maskant coatings on land-based

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

blades is permissible per 6NYCRR228-1.4(b)(4) Table B4 and falls into the category "miscellaneous metal parts coatings" and then "Pretreatment Coatings". This workpiece classification dictates that the coating VOC-content shall not exceed 3.5 lb/(gallon less water and exempt solvents) and this limit is applicable for either air-dried or bake-dried.

Paint booths are controlled by fabric filters. Ductwork is straight through the roof and to the emission point. EP is somewhat near the center of the building.

Emission Source/Control: FTR01 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: BTH#2 - Process

Emission Source/Control: BTH#3 - Process

Emission Source/Control: DIPBH - Process

Item 28.4(From Mod 1):

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

Emission Unit: 2-ACIDS
Process: 202 Source Classification Code: 3-09-011-02
Process Description:

This Process consists of the operations of Final Audit Etch: Turbine blades are cleaned with acids prior to final inspection, controlled w/ Sly scrubber (SCR01) @ 70% efficiency and exhausted to EP00003. Scrubber is inside Bldg #1. Emissions are hydrochloric acid (HAP) and nitric acid.

Emission Source/Control: SCR01 - Control
Control Type: PACKED GAS ABSORPTION SYSTEM, GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: FINAL - Process

Item 28.5(From Mod 1):

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

Emission Unit: 2-ACIDS
Process: 203 Source Classification Code: 3-09-011-02
Process Description:

This Process consists of the operations of the Old Chemical Milling Line and the Manual/Small Chemical Milling Line: Turbine blades are physically reduced in size (metal removal) via acid etching. The airstream that comes off these milling operations are ducted through the SE building wall and then are controlled in Source SCR04, a Van Aire packed-bed scrubber (The emissions from Process

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

204 are also ducted to Source SCR04). Emissions are hydrofluoric acid (HAP) and nitric acid.

Note: Source SCR04 (scrubber) has been placed into Process 203, but the emissions from Process 204 are also ducted to Source SCR04. In effect, an airstream of emissions is crossing the boundaries of two Processes; this could be a confusing point.

Emission Source/Control: SCR04 - Control
Control Type: SCRUBBER - PACKED BED

Emission Source/Control: OLDCM - Process

Item 28.6(From Mod 1):

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

Emission Unit: 2-ACIDS

Process: 204

Source Classification Code: 3-16-130-01

Process Description:

This Process consists of the operations of the New Chemical Milling Line: Turbine blades are physically reduced in size (metal removal) via acid etching. The airstream that comes off this milling operation is ducted through the SE building wall and then are controlled in Source SCR04, a Van Aire packed-bed scrubber (The emissions from Process 203 are also ducted to Source SCR04). Scrubber is outside and SE of Bldg #3. Emissions are hydrofluoric acid (HAP) and nitric acid.

Note: Source SCR04 (scrubber) has been placed into Process 203, but the emissions from Process 204 are also ducted to Source SCR04. In effect, an airstream of emissions is crossing the boundaries of two Processes; this could be a confusing point.

Emission Source/Control: SCR04 - Control
Control Type: SCRUBBER - PACKED BED

Emission Source/Control: NEWCM - Process

Item 28.7(From Mod 1):

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

Emission Unit: 2-ACIDS

Process: 205

Source Classification Code: 3-09-011-03

Process Description:

This process consists of the Blue Etch Anodizing Operation: acid and alkaline metal treatments impart a blue tint into turbine blades. Note: There are no HF emissions in Process 205. The purpose of the blue tint is to facilitate some exacting inspection procedures. This process is comprised of eight tanks attended by one robot.

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

There is no control on this Process. Source BLET2 exhausts through the roof at emission point 00054.

Emission Source/Control: BLET2 - Process

Item 28.8(From Mod 1):

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

Emission Unit: 2-ACIDS

Process: 206

Source Classification Code: 3-16-130-01

Process Description:

This Process consists of the functions of the Virgo Operations: Glass frit maskant coating is removed from turbine blades by an acid etching process after various forging operation are completed, no control exists, exhausts to (through the roof) both EP00043 and EP00053. Emissions are nitric acid.

Emission Source/Control: VIRGO - Process

Item 28.9(From Mod 1):

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

Emission Unit: 2-ACIDS

Process: 207

Source Classification Code: 3-09-011-02

Process Description:

This Process consists of the operations of the Turco Etch Line. Titanium metal leading edges (MLEs) are etched with a caustic solution followed by a de-smutting function in a weak nitric acid solution. This line has seven tanks where MLEs are dipped successively in 3 alkaline solutions, 3 nitric acid desmut solutions and 2 rinses. Airstream from this line is ducted through the approximate NW wall of building, through a Van Aire VF-351 packed-bed scrubber (Source SCR05) and then released through emission point 00056.

Emission Source/Control: SCR05 - Control

Control Type: SCRUBBER - PACKED BED

Emission Source/Control: TURCO - Process

Item 28.10(From Mod 1):

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

Emission Unit: 2-ACIDS

Process: 256

Source Classification Code: 3-16-130-01

Process Description:

This Process consists of the operation of a XXX packed-bed scrubber (Model XYZ123). This scrubber's purpose is to control emissions of hydrogen fluoride that originates from the HF tank in the Blue Etch operation and also from the HF tank in the Virgo Operation, this

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

scrubber achieves >98% DRE.

Emission Source/Control: SCR06 - Control
Control Type: SCRUBBER - PACKED BED

Emission Source/Control: BLET1 - Process
Design Capacity: 3,000 cubic feet per minute

Emission Source/Control: VIRG1 - Process
Design Capacity: 3,000 cubic feet per minute

Item 28.11(From Mod 1):

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

Emission Unit: 3-MANUF
Process: 301 Source Classification Code: 3-04-003-55
Process Description:

This process is a machining operation that is performed by electro-discharge machining (EDM). Metal is removed by electric arc and is a wet operation. Hoods, a duct network and a fan collect and remove emissions through a roof stack, at least in the NW corner area. EDM emissions are metal and/or coolant particulates.

Emission Source/Control: 00EDM - Process

Item 28.12(From Mod 1):

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

Emission Unit: 3-MANUF
Process: 304 Source Classification Code: 3-12-999-99
Process Description:

This process consists of the operation of the "Savage NC Saw". This machine tool cuts bar stock to size. Unit exhausts through Rotoclone #6 (a control cyclone, located in west-ish portion of main building) and particulate emissions exhaust to EP00013, which penetrates the roof.

Note: This saw is unrelated to any EDM operations.

Emission Source/Control: RCL06 - Control
Control Type: WET ROTOCLONE

Emission Source/Control: SAW01 - Process

Item 28.13(From Mod 1):

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

Emission Unit: 3-MANUF
Process: 305 Source Classification Code: 3-04-020-02
Process Description:

This Process consists of the operations of the Robodrill

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035

machining centers, which cut solid graphite blocks down to EDM electrodes for eventual usage in EDM machining centers (via electric-arc, EDM hollows-out the internal cores of some turbine blades). Graphite particulates are generated, ducted through the wall near the NW corner of building, through the Camfil cartridge filter dust collector (Source 00DST) and then released through emission point 00059.

Emission Source/Control: DST01 - Control
Control Type: FABRIC FILTER

Emission Source/Control: ROBOD - Process

Permit ID: 6-3070-00035/00045

Facility DEC ID: 6307000035