

Facility DEC ID: 846060024

**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 8-4606-00024/00015  
Effective Date:

Expiration Date:

Permit Issued To:ALSTOM TRANSPORTATION INC  
4 SKYLINE DR  
HAWTHORNE, NY 10532-2160

Contact: ROBERT GEHL  
1 TRANSIT DR  
HORNELL, NY 14843  
(607) 385-1037

Facility: ALSTOM - HORNELL CAR SHOP  
1 TRANSIT DR  
HORNELL, NY 14843

Contact: WILLIAM PULLING  
1 TRANSIT DR  
HORNELL, NY 14843  
(607) 794-7465

**Description:**

Initial Air State Facility Permit for Alstom Transportation Group - Hornell Car Shop facility, located at 1 Transit Drive, Hornell, NY, which assembles and refurbishes rail cars. The facility includes Emission Unit U-HSCP B for surface coating of rail cars. The facility currently operates under an Air Facility Registration and is obtaining an Air State Facility permit due to anticipated increases in business activity and air emissions.

This initial Air State Facility permit establishes federally enforceable emissions caps under 6 NYCRR 201-7 to limit facility VOC, Total HAP, and ten individual HAP emissions below Major Source Thresholds. Associated monitoring conditions are included to ensure continuous compliance with the caps..

Facility surface coating operations are subject to the requirements of 6 NYCRR Part 228-1 - Surface Coating Operations. Additionally, emissions of diisocyanate compounds from surface coating are subject to the requirements of 6 NYCRR Part 212 - Process Operations. The facility complies with the requirements of Part 212 through limiting annual process emissions of diisocyanate emissions below the 10 lbs/year Mass Emission Limit under 6 NYCRR 212-2.2.

Pursuant to the requirements of Section 7(2) of the Climate Leadership and Community Protection Act (CLCPA), the Department has requested and received information regarding the project's consistency with the CLPCA.

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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:        THOMAS P HALEY  
   6274 E AVON LIMA RD  
   AVON, NY 14414-9519

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_\_

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### 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.

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**DEC GENERAL CONDITIONS**

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- 6 4 Permit modifications, suspensions or revocations by the Department

**Facility Level**

- 6 5 Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

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

**Condition 1: Facility Inspection by the Department**  
**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**  
**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3**

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

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**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 8 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 8 Headquarters  
Division of Environmental Permits  
6274 Avon-Lima Road  
Avon, NY 14414-9519  
(585) 226-2466

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**Permit Under the Environmental Conservation Law (ECL)**

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:ALSTOM TRANSPORTATION INC  
4 SKYLINE DR  
HAWTHORNE, NY 10532-2160

Facility: ALSTOM - HORNELL CAR SHOP  
1 TRANSIT DR  
HORNELL, NY 14843

Authorized Activity By Standard Industrial Classification Code:  
3743 - RAILROAD EQUIPMENT

Permit Effective Date:

Permit Expiration Date:

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**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 6 1 6 NYCRR 201-7.1: Facility Permissible Emissions
- 7 \*2 6 NYCRR 201-7.1: Capping Monitoring Condition
- 8 \*3 6 NYCRR 201-7.1: Capping Monitoring Condition
- 10 \*4 6 NYCRR 201-7.1: Capping Monitoring Condition
- 11 \*5 6 NYCRR 201-7.1: Capping Monitoring Condition
- 13 \*6 6 NYCRR 201-7.1: Capping Monitoring Condition
- 15 7 6 NYCRR 211.2: Visible Emissions Limited

**Emission Unit Level**

**EU=U-HCSPB**

- 15 8 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 17 9 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 17 10 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 18 11 6 NYCRR 228-1.4 (b) (4): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 21 12 ECL 19-0301: Contaminant List
- 22 13 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 23 14 6 NYCRR Subpart 201-5: Emission Unit Definition
- 23 15 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 24 16 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 24 17 6 NYCRR 211.1: Air pollution prohibited

**Emission Unit Level**

- 25 18 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 25 19 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

**EU=U-HCSPB**

- 26 20 6 NYCRR 212-2.1 (a): Compliance Demonstration

NOTE: \* preceding the condition number indicates capping.



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**FEDERALLY ENFORCEABLE CONDITIONS**  
DRAFT                      **\*\*\*\* 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,

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required to operate such device effectively.

**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**

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**Activities - 6 NYCRR 201-3.3 (a)**

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

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

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

**Item J: Open Fires Prohibitions - 6 NYCRR 215.2**

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

**Item K: Permit Exclusion - ECL 19-0305**

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

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

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

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1: Facility Permissible Emissions**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 201-7.1**

**Item 1.1:**

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

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

CAS No: 000080-62-6 Name: 2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER	PTE: 18,000 pounds per year
CAS No: 000100-41-4 Name: ETHYLBENZENE	PTE: 18,000 pounds per year
CAS No: 000100-42-5 Name: STYRENE	PTE: 18,000 pounds per year
CAS No: 000108-10-1 Name: 2-PENTANONE, 4-METHYL	PTE: 18,000 pounds per year
CAS No: 000108-88-3 Name: TOLUENE	PTE: 18,000 pounds per year
CAS No: 000110-54-3 Name: HEXANE	PTE: 18,000 pounds per year
CAS No: 000584-84-9 Name: BENZENE, 2,4-DIISOCYANATO-1-METHYL-	PTE: 18,000 pounds per year
CAS No: 000822-06-0 Name: HEXANE, 1,6-DIISOCYANATO-	PTE: 18,000 pounds per year
CAS No: 001330-20-7	PTE: 18,000 pounds per year

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Name: XYLENE, M, O & P MIXT.

CAS No: 0NY075-00-5 PTE: 198,000 pounds per year  
 Name: PM-10

CAS No: 0NY075-02-5 PTE: 198,000 pounds per year  
 Name: PM 2.5

CAS No: 0NY100-00-0 PTE: 48,000 pounds per year  
 Name: TOTAL HAP

CAS No: 0NY998-00-0 PTE: 98,000 pounds per year  
 Name: VOC

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

**Applicable Federal Requirement: 6 NYCRR 201-7.1**

**Item 2.1:**

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

6 NYCRR Subpart 201-6

**Item 2.2:**

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

**Item 2.3:**

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

**Item 2.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 2.5:**

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

**Item 2.6:**

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The Compliance Demonstration activity will be performed for the Facility.

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

**Item 2.7:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

To remain below the applicability thresholds of 6 NYCRR Subpart 201-6, Title V Facility Permits, facility annual emissions of PM-10 are limited to a maximum of 99 tons per year on a twelve-month rolling basis.

To demonstrate compliance with this limit, actual facility emissions of PM-10 must be calculated monthly and incorporated into a twelve-month rolling total in tons per year (tpy). PM-10 emissions must be calculated based on purchase records, material usage and production records, coating manufacturer data sheets, and engineering calculations acceptable to the Department.

The facility owner or operator must submit an Annual Capping Report for PM-10 emissions in a format acceptable to the Department. Records of coating purchases, coating usage, calculated emissions, and reports must be maintained for a period of at least five years and made available to the Department upon request.

Parameter Monitored: PM-10  
 Upper Permit Limit: 198000 pounds per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 12 calendar month(s).

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

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 3.1:**

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

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6 NYCRR Subpart 201-6

**Item 3.2:**

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

**Item 3.3:**

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

**Item 3.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 3.5:**

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

**Item 3.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY075-02-5 PM 2.5

**Item 3.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To remain below the applicability thresholds of 6 NYCRR Subpart 201-6, Title V Facility Permits, facility annual emissions of PM-2.5 are limited to a maximum of 99 tons per year on a twelve-month rolling basis.

To demonstrate compliance with this limit, actual facility emissions of PM-2.5 must be calculated monthly and incorporated into a twelve-month rolling total in tons per year (tpy). PM-2.5 emissions must be calculated based on purchase records, material usage and production records, coating manufacturer data sheets, and engineering calculations acceptable to the Department.

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The facility owner or operator must submit an Annual Capping Report for PM-2.5 emissions in a format acceptable to the Department. Records of coating purchases, coating usage, calculated emissions, and reports must be maintained for a period of at least five years and made available to the Department upon request.

Parameter Monitored: PM 2.5

Upper Permit Limit: 198000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

**Applicable Federal Requirement: 6 NYCRR 201-7.1**

**Item 4.1:**

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

6 NYCRR Subpart 201-6

**Item 4.2:**

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

**Item 4.3:**

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

**Item 4.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 4.5:**

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



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**Item 4.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To remain below the applicability thresholds of 6 NYCRR Subpart 201-6, Title V Facility Permits, facility annual emissions of VOCs are limited to a maximum of 49 tons per year on a twelve-month rolling basis.

To demonstrate compliance with this limit, actual facility emissions of VOCs must be calculated monthly and incorporated into a twelve-month rolling total in tons per year (tpy). VOC emissions must be calculated based on purchase records, material usage and production records, coating manufacturer data sheets, and engineering calculations acceptable to the Department.

The facility owner or operator must submit an Annual Capping Report for VOC emissions in a format acceptable to the Department. Records of coating purchases, coating usage, calculated emissions, and reports must be maintained for a period of at least five years and made available to the Department upon request.

Parameter Monitored: VOC  
 Upper Permit Limit: 98000 pounds per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 5:    Capping Monitoring Condition  
 Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 5.1:**

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

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otherwise be subject to:

6 NYCRR Subpart 201-6

**Item 5.2:**

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

**Item 5.3:**

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 5.4:**

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 5.5:**

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 5.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 5.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To remain below the applicability thresholds of 6 NYCRR Subpart 201-6, Title V Facility Permits, facility aggregate annual emissions of total Hazardous Air Pollutants are limited to a maximum of 24 tons per year on a twelve-month rolling basis.

To demonstrate compliance with this limit, actual facility total HAP emissions must be calculated monthly and incorporated into a twelve-month rolling total in tons per year (tpy). Aggregate total HAP emissions must be calculated based on purchase records, material usage and

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production records, coating manufacturer data sheets, and engineering calculations acceptable to the Department.

The facility owner or operator must submit an Annual Capping Report for total HAP emissions in a format acceptable to the Department. Records of coating purchases, coating usage, calculated emissions, and reports must be maintained for a period of at least five years and made available to the Department upon request.

Parameter Monitored: TOTAL HAP  
 Upper Permit Limit: 48000 pounds per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 6: Capping Monitoring Condition  
 Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 6.1:**

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

6 NYCRR Subpart 201-6

**Item 6.2:**

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

**Item 6.3:**

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 6.4:**

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.

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**Item 6.5:**

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 6.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000080-62-6	2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER
CAS No: 000098-82-8	BENZENE, (1-METHYLETHYL)
CAS No: 000100-41-4	ETHYLBENZENE
CAS No: 000100-42-5	STYRENE
CAS No: 000108-10-1	2-PENTANONE, 4-METHYL
CAS No: 000110-54-3	HEXANE
CAS No: 000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-
CAS No: 000822-06-0	HEXANE, 1,6-DIISOCYANATO-
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 000108-88-3	TOLUENE

**Item 6.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To remain below the applicability thresholds of 6 NYCRR Subpart 201-6, Title V Facility Permits, facility annual emissions of each individual Hazardous Air Pollutant (HAP) are limited to a maximum of 9 tons per year on a twelve-month rolling basis.

To demonstrate compliance with this limit, actual facility emissions of each individual HAP must be calculated monthly and incorporated into a twelve-month rolling total in tons per year (tpy). Individual HAP emissions must be calculated based on purchase records, material usage and production records, coating manufacturer data sheets, and engineering calculations acceptable to the Department.

The facility owner or operator must submit an Annual Capping Report for each HAP subject to an emissions cap. Annual Capping Reports must be submitted in a format acceptable to the Department.

Records of coating purchases, usage, calculated emissions, and annual reports must be maintained for a period of at least five years and made available to the Department upon

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request.

Parameter Monitored: SPECIATED HAP CONTENT  
Upper Permit Limit: 18000 pounds per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

**Condition 7: Visible Emissions Limited**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 7.1:**

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

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

**Item 8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-HCSPB

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting a Method 9 opacity evaluation at a minimum frequency of once per year, while the source is in normal operating mode.

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

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the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

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

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

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Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Surface Coating- Prohibitions**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 228-1.3 (c)**

**Item 9.1:**

This Condition applies to Emission Unit: U-HCSPB

**Item 9.2:**

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

**Condition 10: Surface Coating - Handling, storage and disposal**  
**Effective for entire length of Permit**

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

**Item 10.1:**

This Condition applies to Emission Unit: U-HCSPB

**Item 10.2:**

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

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

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

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

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- (4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
  - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
  - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
  - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
  - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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

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

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-HCSPB

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

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Surface coating operations subject 6 NYCRR 228-1 that demonstrate compliance through the use of compliant coatings must meet the applicable as-applied VOC content limits under 6 NYCRR 228-1.4. For air-dried (maximum drying temperature of 90 degrees C) coating lines that coat miscellaneous metal parts using extreme performance coatings, the as-applied coating VOC content is limited to



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a maximum of 3.5 lbs/gallon (0.36 kg VOC/l) per 6 NYCRR 228-1.(b)(4), Table B4.

To demonstrate compliance with this limit the facility owner or operator must document the as-applied coating VOC content using manufacturer documentation (e.g., data sheets), engineering calculations, and/or or sampling data. The Department may request that the facility owner or operator conduct sampling of coatings at any time.

Records of sampling data, manufacturer data sheets, calculations, and other documentation used to demonstrate compliance must be maintained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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**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

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with 6 NYCRR Part 616 - Public Access to Records.  
Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 12: Contaminant List**  
**Effective for entire length of Permit**

**Applicable State Requirement:ECL 19-0301**

**Item 12.1:**

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

CAS No: 000080-62-6

Name: 2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER

CAS No: 000098-82-8

Name: BENZENE, (1-METHYLETHYL)

CAS No: 000100-41-4

Name: ETHYLBENZENE

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CAS No: 000100-42-5  
Name: STYRENE

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

CAS No: 000108-88-3  
Name: TOLUENE

CAS No: 000110-54-3  
Name: HEXANE

CAS No: 000584-84-9  
Name: BENZENE, 2,4-DIISOCYANATO-1-METHYL-

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

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

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

CAS No: 0NY075-02-5  
Name: PM 2.5

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

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

**Condition 13: Malfunctions and Start-up/Shutdown Activities  
Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 13.1:**

(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

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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.

**Condition 14: Emission Unit Definition**  
**Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 14.1:**

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

Emission Unit: U-HCSPB

Emission Unit Description:

U-HCSPB consists of surface coating of rail cars within three spray paint booths housed within the Hornell Car Shop. The three paint booths are designated as the "east", "west" and "center" booths. The East Booth (ES 00006) is associated with EP 00016 and fabric filter Control 00106. The Center Booth (ES 00002) is associated with EPs 00012 and 0012B and fabric filter Control 00102. The West Booth (ES 00004) is associated with EP 00014 and fabric filter Control 00104.

Building(s): HCS

**Condition 15: Renewal deadlines for state facility permits**  
**Effective for entire length of Permit**

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

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**Item 15.1:**

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

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

**Item 16.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 16.2:**

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 8  
6274 East Avon-Lima Rd.  
Avon, NY 14414

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 17: Air pollution prohibited  
Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 17.1:**

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.

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

**Condition 18: Emission Point Definition By Emission Unit  
Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 18.1:**

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

Emission Unit: U-HCSPB

Emission Point: 00012  
 Height (ft.): 39 Diameter (in.): 48  
 NYTMN (km.): 4688.16 NYTME (km.): 281.46 Building: HCS

Emission Point: 00014  
 Height (ft.): 39 Diameter (in.): 60  
 NYTMN (km.): 4688.19 NYTME (km.): 281.49 Building: HCS

Emission Point: 00016  
 Height (ft.): 37 Diameter (in.): 42  
 NYTMN (km.): 4688.21 NYTME (km.): 281.51 Building: HCS

Emission Point: 0012B  
 Height (ft.): 39 Diameter (in.): 48  
 NYTMN (km.): 4688.198 NYTME (km.): 281.491 Building: HCS

**Condition 19: Process Definition By Emission Unit  
Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 19.1:**

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

Emission Unit: U-HCSPB

Process: PAB Source Classification Code: 4-02-025-01

Process Description:

Surface coating of rail transit cars within spray paint booths. Surface coating materials include topcoats, enamels, activators, hardeners, additives, primers and epoxy primers. The paint booths are equipped with fabric filters integral to their construction to control particulate emissions from surface coating operations.

Emission Source/Control: 00102 - Control  
 Control Type: FABRIC FILTER

Emission Source/Control: 00104 - Control  
 Control Type: FABRIC FILTER

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Emission Source/Control: 00106 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 00002 - Process

Emission Source/Control: 00004 - Process

Emission Source/Control: 00006 - Process

**Condition 20: Compliance Demonstration  
Effective for entire length of Permit**

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

**Item 20.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-HCSPB

Regulated Contaminant(s):

CAS No: 000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-
CAS No: 000822-06-0	HEXANE, 1,6-DIISOCYANATO-

**Item 20.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Air contaminants emitted from surface coating processes subject to 6 NYCRR 228-1 which have been assigned an Environmental Rating of "A" are subject to the requirements of 6 NYCRR 212. Diisocyanate compounds are listed as a High Toxicity Air Contaminants (HTAC) under Table 2 to 6 NYCRR 212-2.2 and have been assigned an A-rating. Therefore, diisocyanate compounds emissions from Emission Unit U-HCSPB are subject to 6 NYCRR 212.

The facility owner or operator must comply with either the mass emission limit (MEL) in Subdivision 212-2.2, Table 2 - HTAC List or the requirements specified in Subdivision 212-2.3(b), Table 4 - Degree of Air Cleaning Required for Non-Criteria Air Contaminants.

Based on information submitted to the Department, actual process emissions of diisocyanate compounds are less than the 100 lbs/year MEL in Table 2. To demonstrate continuous compliance with this limit the facility owner or operator must keep records of actual diisocyanate emissions, as required in the 6 NYCRR 201-7 capping monitoring condition elsewhere in this permit. Emissions must be calculated on a monthly basis and incorporated into a 12-month rolling



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total consistent with the capping monitoring condition.

If 12-month rolling diisocyanate process emissions exceed, or are anticipated to exceed the MEL, the facility must submit documentation to the Department within 30 days demonstrating a that the maximum offsite ambient air concentration is less than the DEC Program Policy DAR-1 guideline concentrations or install add-on control meeting the degree of air cleaning specified in Table 4 to 6 NYCRR 212-2.3(b). Compliance with the DAR-1 guideline concentrations must be documented in a Toxic Impact Assessment prepared in accordance with the procedures in DAR-1.

Records of facility diisocyanate emissions and any submissions to the Department must be kept for at least five years and made available to the Department upon request.

Parameter Monitored: SPECIATED HAP CONTENT

Upper Permit Limit: 100 pounds per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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