



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-0608-00161/00065  
Mod 0 Effective Date: 09/23/2014 Expiration Date: 09/22/2024  
Mod 1 Effective Date: 09/23/2014 Expiration Date: 09/22/2024

Permit Issued To:BLACKSTONE ADVANCED TECHNOLOGIES LLC  
86 BLACKSTONE AVE  
JAMESTOWN, NY 14701

Contact: WAYNE A BERG  
BLACKSTONE ADVANCED TECHNOLOGIES  
100 BLACKSTONE AVE  
JAMESTOWN, NY 14701  
(716) 665-5410

Facility: BLACKSTONE ADVANCED TECHNOLOGIES  
100 BLACKSTONE AVE  
JAMESTOWN, NY 14701

Contact: WAYNE A BERG  
BLACKSTONE ADVANCED TECHNOLOGIES  
100 BLACKSTONE AVE  
JAMESTOWN, NY 14701  
(716) 665-5410

Description:  
This permit modification is for a change in the name and owner from Blackstone Business Enterprises to Blackstone Advanced Technologies LLC.

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9060800161**



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:           LISA PORTER  
  270 MICHIGAN AVE  
  BUFFALO, NY 14203-2915

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



**Notification of Other State Permittee Obligations**

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

**NO CONDITIONS FOR THIS PERMIT**

**New York State Department of Environmental Conservation**

Permit ID: 9-0608-00161/00065

Facility DEC ID: 9060800161



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To:BLACKSTONE ADVANCED TECHNOLOGIES LLC  
86 BLACKSTONE AVE  
JAMESTOWN, NY 14701

Facility: BLACKSTONE ADVANCED TECHNOLOGIES  
100 BLACKSTONE AVE  
JAMESTOWN, NY 14701

Authorized Activity By Standard Industrial Classification Code:  
3479 - METAL COATING AND ALLIED SERVICES,NEC

Mod 0 Permit Effective Date: 09/23/2014

Permit Expiration Date: 09/22/2024

Mod 1 Permit Effective Date: 09/23/2014

Permit Expiration Date: 09/22/2024



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**EU=0-00001**

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**FEDERALLY ENFORCEABLE CONDITIONS**  
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**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

**Item A: Sealing - 6 NYCRR 200.5**

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

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

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

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

**Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6**

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

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

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



required to operate such device effectively.

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

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

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

**Item E: Emergency Defense - 6 NYCRR 201-1.5**

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

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

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

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



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

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

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

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

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

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

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

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

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

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





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

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

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

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

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

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

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

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

**Condition 1: Recycling and Salvage**



**Effective between the dates of 09/23/2014 and 09/22/2024**

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Replaces Condition(s) 2-3**

**Item 1.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 2: Exempt Sources - Proof of Eligibility**  
**Effective between the dates of 09/23/2014 and 09/22/2024**

**Applicable Federal Requirement:6 NYCRR 201-3.2 (a)**

**Replaces Condition(s) 2-5**

**Item 2.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

**Condition 3: Trivial Sources - Proof of Eligibility**  
**Effective between the dates of 09/23/2014 and 09/22/2024**

**Applicable Federal Requirement:6 NYCRR 201-3.3 (a)**

**Replaces Condition(s) 2-6**

**Item 3.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

**Condition 4: Air pollution prohibited**  
**Effective between the dates of 09/23/2014 and 09/22/2024**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 4.1:**

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 5: Surface Coating- Prohibitions**  
**Effective between the dates of 09/23/2014 and 09/22/2024**



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

**Item 5.1:**

(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.

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

**Condition 6: Compliance Demonstration**  
**Effective between the dates of 09/23/2014 and 09/22/2024**

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

**Item 6.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

1.) No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any surface coating process emission source, except only the emission of uncombined water.

2.) Once a year while the source is operating normally, observe for visible emissions and document the observation. If visible emissions are observed, then



conduct a Method 9 opacity evaluation to determine compliance. If an exceedance is documented, record the cause and corrective action in the log book.

3.) The records 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 emission point:

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9, 40 CFR Part 60, Appendix A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 7: Compliance Demonstration**  
**Effective between the dates of 09/23/2014 and 09/22/2024**

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

**Item 7.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90



percent.

4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.

5. Any additional information required to determine compliance with Part 228-1.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 8: Surface Coating - Handling, storage and disposal  
Effective between the dates of 09/23/2014 and 09/22/2024**

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

**Item 8.1:**

This Condition applies to Emission Unit: 0-00001

**Item 8.2:**

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

- (1) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:



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

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 09/23/2014 and 09/22/2024**

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

HHHHHH

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

General Requirements for Miscellaneous Surface Coating Operations

A.) Each miscellaneous surface coating operation must meet the following requirements:

1.) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The spray application of surface coatings is prohibited by persons who are not certified.

2.) All spray-applied coatings must be applied in a spray booth or preparation station that meets the requirements below:

i) Be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. Owners and operators may use published filter efficiency data provided by filter vendors or they may conduct a filter efficiency test that is consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1.

ii) 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.

3.) 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.

4.) 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.

B.) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings. The training program must include, at a minimum, the following items:

- 1.) A list of all current personnel by name and job description who are required to be trained;
- 2.) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
  - i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
  - ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
  - iii) Routine spray booth and filter maintenance, including filter selection and installation.
  - iv) Environmental compliance with the requirements of



this subpart.

3.) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training.

C.) All new or existing personnel who spray surface coatings must complete training no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire. Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements above and be re-certified every five years.

D.) The above documents shall be kept for at least five years and be made available for inspection upon request.

E.) The permit condition has no reporting requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 09/23/2014 and 09/22/2024**

**Applicable Federal Requirement: 40CFR 63.11177, Subpart HHHHHH**

**Item 10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Record Keeping

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in §63.11173(f) with the date the





- initial training and the most recent refresher training was completed.
- (b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).
  - (c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).
  - (d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.
  - (e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).
  - (f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.
  - (g) Records of any deviation from the requirements in §§63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
  - (h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

You must maintain copies of the records specified above for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period. The above records must be submitted if requested.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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

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

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

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

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

**Condition 11: Contaminant List**  
**Effective between the dates of 09/23/2014 and 09/22/2024**



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

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

No contaminants.

**Condition 12: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 09/23/2014 and 09/22/2024**

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

**Item 12.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 13: Emission Unit Definition**  
**Effective between the dates of 09/23/2014 and 09/22/2024**



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

**Item 13.1(From Mod 0):**

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

Emission Unit: 0-00001

Emission Unit Description:

This emission unit is for the solvent-based wet spray process which includes six spray booths & two paint cure batch ovens located on the main floor of the facility. Each spray booth and oven has it's own separate emission point number, except booth 36 which has two emission points.

Building(s): MAIN

**Item 13.2(From Mod 0):**

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

Emission Unit: 0-00101

Emission Unit Description:

Blackstone has five carbon dioxide (CO<sub>2</sub>) laser cutting machines. Each laser has a built in baffle to reduce particulate emissions. Three lasers are permitted, lasers 3, 4 and 5 with emission points 53, 104 and 105 respectively. The three lasers are located on main floor of building. These lasers were installed in 2005, 2006 and 2007 respectively.

Two lasers, lasers 1 and 2, are exempt from permitting because they now exhaust inside through dedicated particulate filters. The filter systems are One Donaldson Torit Power Core Model TG 8 Dust Collector with 8 Power Core filter packs. These filters were installed because the hexavalent chromium emissions from cutting stainless steel with the lasers exceeded the Annual Guidance Concentration in DAR-1. Now all stainless steel MUST be cut on one of the machines that exhausts through the new Donaldson filter systems.

Building(s): MAIN

**Condition 14: Renewal deadlines for state facility permits  
Effective between the dates of 09/23/2014 and 09/22/2024**

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

**Item 14.1:**

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 15: Compliance Demonstration**

**New York State Department of Environmental Conservation**

Permit ID: 9-0608-00161/00065

Facility DEC ID: 9060800161



**Effective between the dates of 09/23/2014 and 09/22/2024**

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

**Item 15.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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 9  
270 Michigan Ave.  
Buffalo, NY 14203

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 16: Visible Emissions Limited**

**Effective between the dates of 09/23/2014 and 09/22/2024**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 16.1:**

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 17: Emission Point Definition By Emission Unit**

**Effective between the dates of 09/23/2014 and 09/22/2024**

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

**Item 17.1(From Mod 0):**

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

Emission Unit: 0-00001

New York State Department of Environmental Conservation

Permit ID: 9-0608-00161/00065

Facility DEC ID: 9060800161



Emission Point: 00015			
Height (ft.): 20	Diameter (in.): 13		
NYTMN (km.): 4670.1	NYTME (km.): 151.2	Building: MAIN	
Emission Point: 00016			
Height (ft.): 20	Diameter (in.): 13		
NYTMN (km.): 4670.1	NYTME (km.): 151.2	Building: MAIN	
Emission Point: 00019			
Height (ft.): 25	Diameter (in.): 32		
NYTMN (km.): 4670.1	NYTME (km.): 151.2	Building: MAIN	
Emission Point: 00020			
Height (ft.): 25	Diameter (in.): 32		
NYTMN (km.): 4670.1	NYTME (km.): 151.2	Building: MAIN	
Emission Point: 00021			
Height (ft.): 25	Diameter (in.): 32		
NYTMN (km.): 4670.1	NYTME (km.): 151.2	Building: MAIN	
Emission Point: 00022			
Height (ft.): 25	Diameter (in.): 32		
NYTMN (km.): 4670.1	NYTME (km.): 151.2	Building: MAIN	
Emission Point: 00023			
Height (ft.): 25	Diameter (in.): 32		
NYTMN (km.): 4670.1	NYTME (km.): 151.2	Building: MAIN	
Emission Point: 00191			
Height (ft.): 20	Diameter (in.): 32		
NYTMN (km.): 4670.3	NYTME (km.): 151.2	Building: MAIN	
Emission Point: 00192			
Height (ft.): 20	Diameter (in.): 32		
NYTMN (km.): 4670.3	NYTME (km.): 151.2	Building: MAIN	

**Item 17.2(From Mod 0):**

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

Emission Unit: 0-00101			
Emission Point: 00053			
Height (ft.): 30	Diameter (in.): 18		
NYTMN (km.): 4670.48	NYTME (km.): 151.54	Building: MAIN	
Emission Point: 00104			
Height (ft.): 30	Diameter (in.): 18		
NYTMN (km.): 4670.1	NYTME (km.): 151.2	Building: MAIN	
Emission Point: 00105			
Height (ft.): 30	Diameter (in.): 18		
NYTMN (km.): 4670.1	NYTME (km.): 151.2	Building: MAIN	



**Condition 18: Process Definition By Emission Unit**  
Effective between the dates of 09/23/2014 and 09/22/2024

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

**Item 18.1(From Mod 0):**

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

Emission Unit: 0-00001

Process: 120

Source Classification Code: 4-02-020-33

**Process Description:**

There are 6 wet spray solvent based spray booths including 1 new booth. These booths have a total of 7 emission points. These spray booths are equipped with spray filters. All booths have 1 emission point except the new booth, which has 2 emission points (booth #36, emission points 00191 and 00192). In addition, there are 2 paint cure oven exhausts downstairs (ovens 1 & 2). These cure ovens discharge to the atmosphere via stacks through the roof. There are exhaust hoods at the entry and exit of the ovens to exhaust heat, these are exempt from permitting.

Emission Source/Control: 0001F - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0002F - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0003F - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0004F - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0005F - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 00001 - Process

Design Capacity: 13,843 cubic feet per minute

Emission Source/Control: 00002 - Process

Design Capacity: 13,843 cubic feet per minute

Emission Source/Control: 00003 - Process

Design Capacity: 13,843 cubic feet per minute

Emission Source/Control: 00004 - Process

Design Capacity: 13,843 cubic feet per minute

Emission Source/Control: 00005 - Process





Design Capacity: 13,843 cubic feet per minute

Emission Source/Control: 00011 - Process  
Design Capacity: 1,671 cubic feet per minute

Emission Source/Control: 00015 - Process  
Design Capacity: 4,660 cubic feet per minute

**Item 18.2(From Mod 0):**

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

Emission Unit: 0-00101

Process: 0LZ

Source Classification Code: 6-82-410-46

Process Description:

Carbon dioxide (CO<sub>2</sub>) laser cutting machines use a highly focused light beam to cut sheet metal. Particulates and fumes pass through a drop box device where most of the solids settle out. The drop box device is integrated into the laser machines. Remaining fumes are emitted through individual stacks for each laser. Two of the five lasers exhaust inside through particulate control equipment so they do not need a permit as long as controls are operated properly.

Emission Source/Control: DB003 - Control  
Control Type: BAFFLE

Emission Source/Control: DB004 - Control  
Control Type: BAFFLE

Emission Source/Control: DB005 - Control  
Control Type: BAFFLE

Emission Source/Control: LASE3 - Process  
Design Capacity: 2,000 watts

Emission Source/Control: LASE4 - Process  
Design Capacity: 2,000 watts

Emission Source/Control: LASE5 - Process  
Design Capacity: 2,000 watts

