



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2909-00052/00045
Effective Date: 08/19/2016 Expiration Date: 08/18/2026

Permit Issued To: METAL CLADDING INC
230 S NIAGARA ST
LOCKPORT, NY 14094-1927

Contact: JOHN A SHEPHERD
METAL CLADDING INC
230 S NIAGARA ST
LOCKPORT, NY 14094
(716) 434-5513

Facility: METAL CLADDING INC
230 S NIAGARA ST
LOCKPORT, NY 14094

Contact: JOHN A SHEPHERD
METAL CLADDING INC
230 S NIAGARA ST
LOCKPORT, NY 14094
(716) 434-5513

Description:

Metal Cladding provides advanced coating applications to a wide variety of industries. Volatile organic compound (VOC) and powder based coatings are applied in five different coating lines consisting of individual emission sources such as blasting booths, spray booths and curing ovens. Several other emission points are located throughout the facility and include grinding booths for the finishing of fiberglass reinforced plastic (FRP) molded parts and an aqueous phosphate line. There are also 16 exempt and trivial emission points associated with curing ovens for powder coated or aqueous coating lines, aqueous parts washing, hand-held welding and aqueous evaporation processes.

These activities are organized into six emission units:

- U-MZLAB – this emission unit consists of electrostatic spray booths and ovens which are subject to 6 NYCRR Part 228-1.
- U-TKDP1 – this emission unit consists of spray booths and ovens which are subject to 6 NYCRR Part 228-1.



- U-ROTAM – this emission unit consists of spray booths and ovens within the rotary atomizer department which are subject to 6 NYCRR Part 228-1.
- U-CLAD1 – this emission unit consists of spray booths and ovens within the cladding department which are subject to 6 NYCRR Part 228-1 and Part 212.
- U-MOLD1 – this emission unit consists of a FRP gel coat booth and grinding booth which are subject to 6 NYCRR Part 212.
- U-PLATE – this emission unit consists of an aqueous based phosphate line which are subject to 6 NYCRR Part 212.

The facility is subject to 6 NYCRR Part 228-1 for coating of miscellaneous metal parts. Most coatings used at the facility meet the VOC content requirements per 228-1.4(b). But, a lesser degree of control has been established per Part 228-1.5(e) for eight specific coatings (958-203, 958-207, 958-303, E-333, GP 1904, RTM 9356, Polane G Plus, and Heresite P413C/Ethanol) used at the facility. Metal Cladding submitted a detailed process-specific Reasonably Available Control Technology (RACT) analysis which successfully demonstrated the technical and economic infeasibility of controlling VOC emissions from these eight specific coatings. Also, Metal Cladding has committed to cease use of the non-compliant Heresite coating by December 31, 2016. Metal Cladding must submit an annual emission report which includes the monthly emissions and total emissions attributed to the non-compliant coatings for each rolling 12-month period throughout the calendar year.

Metal Cladding completed an air dispersion modeling analysis per 6 NYCRR Part 212 for emissions from the fiberglass operation within emission unit U-MOLD1. The analysis showed that the maximum off-site styrene concentration is less than the short-term and annual guidance concentrations for styrene, and that a conservative odor threshold for styrene is not exceeded after the emission point was redesigned to create better dispersion.



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 M CZECHOWICZ
 NYSDEC - REGION 9
 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.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a renewal application at least 180 days before expiration of permits for both 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.

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 9 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 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-2909-00052/00045

Facility DEC ID: 9290900052



Permit Under the Environmental Conservation Law (ECL)

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

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Permit Issued To: METAL CLADDING INC
230 S NIAGARA ST
LOCKPORT, NY 14094-1927

Facility: METAL CLADDING INC
230 S NIAGARA ST
LOCKPORT, NY 14094

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

Permit Effective Date: 08/19/2016

Permit Expiration Date: 08/18/2026



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 211.1: Air pollution prohibited
- 2 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 3 6 NYCRR 212-2.1 (b): Compliance Demonstration
- 4 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 5 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 6 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 7 6 NYCRR 228-1.3 (c): Compliance Demonstration
- 8 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 9 6 NYCRR 228-1.3 (e): Surface coating application requirements
- 10 6 NYCRR 228-1.4 (b): Compliance Demonstration
- 11 6 NYCRR 228-1.5 (e): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 12 ECL 19-0301: Contaminant List
- 13 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 14 6 NYCRR Subpart 201-5: Emission Unit Definition
- 15 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 16 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 17 6 NYCRR 211.2: Visible Emissions Limited
- 18 6 NYCRR 212-2.1 (a): Compliance Demonstration

Emission Unit Level

- 19 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 20 6 NYCRR Subpart 201-5: Process Definition By Emission Unit
- 21 6 NYCRR 212-2.3 (b): Compliance Demonstration



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial



Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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



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

FEDERAL APPLICABLE REQUIREMENTS

The following conditions are federally enforceable.

Condition 1: Air pollution prohibited
Effective between the dates of 08/19/2016 and 08/18/2026

Applicable Federal Requirement:6 NYCRR 211.1

Item 1.1:

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 2: Compliance Demonstration
Effective between the dates of 08/19/2016 and 08/18/2026

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 2.1:

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

Emission Unit: U-CLAD1
Process: FOR

Emission Unit: U-MOLD1

Emission Unit: U-PLATE

Item 2.2:

Compliance Demonstration shall include the following monitoring:

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

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Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water. The Department reserves the right to require Metal Cladding to perform a visible emission observation per USEPA Reference Method 9 upon request.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Reference Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Compliance Demonstration
Effective between the dates of 08/19/2016 and 08/18/2026

Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)

Item 3.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-MOLD1 Emission Point: 00061

Regulated Contaminant(s):
CAS No: 000100-42-5 STYRENE

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Metal Cladding completed an air dispersion modeling analysis to determine if the maximum off-site styrene concentration is less than the short-term and annual guidance concentrations for styrene, and whether or not odor thresholds were exceeded.

A Summary of Air Dispersion Modeling Analysis dated April 14, 2016 details the analysis performed by Golder Associates. The initial analysis indicated that the expected concentrations fell below the annual and short-term guidance concentration thresholds, but not below the conservative odor threshold of 200 micrograms/cubic meter. Emission point EP061 was redesigned from a horizontal exhaust which exited the side of the building, to a vertical round stack extending above

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the roof line. The analysis using the modified emission point showed expected concentrations below the odor threshold due to greater dispersion.

When applying for permit renewal, Metal Cladding shall update the Analysis as necessary to address any changes to pertinent regulations or generally accepted odor threshold concentrations.

Monitoring Frequency: UPON PERMIT RENEWAL

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 4: Compliance Demonstration
Effective between the dates of 08/19/2016 and 08/18/2026

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

Item 4.1:

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

Emission Unit: U-CLAD1
Process: FOR

Emission Unit: U-MOLD1

Emission Unit: U-PLATE

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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

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

The Department reserves the right to require Metal Cladding to perform testing to prove compliance with the particulate emission standard if necessary.

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Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Reference Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration
Effective between the dates of 08/19/2016 and 08/18/2026

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

Item 5.1:

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

Emission Unit: 1-MZLAB

Emission Unit: 1-ROTAM

Emission Unit: 1-TKDP1

Emission Unit: U-CLAD1

Item 5.2:

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.

The permittee will conduct regular observations of visible emissions from the emission unit, process, etc. to which this condition applies while the source is in normal operating mode. 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

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Emission Unit: U-CLAD1

Emission Unit: U-MOLD1

Item 6.2:

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 7: Compliance Demonstration
Effective between the dates of 08/19/2016 and 08/18/2026

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

Item 7.1:

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

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Emission Unit: 1-MZLAB

Emission Unit: 1-ROTAM

Emission Unit: 1-TKDP1

Emission Unit: U-CLAD1

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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:

- (1) 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;
- (2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and
- (3) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration
Effective between the dates of 08/19/2016 and 08/18/2026

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



Item 8.1:

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

Emission Unit: 1-MZLAB

Emission Unit: 1-ROTAM

Emission Unit: 1-TKDP1

Emission Unit: U-CLAD1

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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

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

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

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



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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Surface coating application requirements
Effective between the dates of 08/19/2016 and 08/18/2026

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

Item 9.1:

This Condition applies to:

Emission Unit: 1MZLAB

Emission Unit: 1ROTAM

Emission Unit: 1TKDP1

Emission Unit: UCLAD1

Item 9.2:

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;

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- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;
- (vii) airless spray, (including air assisted);
- (viii) airbrush application methods for stenciling, lettering, and other identification markings; or
- (ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

Condition 10: Compliance Demonstration
Effective between the dates of 08/19/2016 and 08/18/2026

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

Item 10.1:

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

Emission Unit: 1-MZLAB

Emission Unit: 1-ROTAM

Emission Unit: 1-TKDP1

Emission Unit: U-CLAD1

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility performing a Class B coating process shall not operate unless the strategies to control VOC emissions as defined in Subdivision 228-1.4(b) for the various types of Class B coating lines are used unless the appropriate emission control requirements of Section 228-1.5 of this Part have been met or a process specific RACT variance has been granted in accordance with Subdivision 228-1.5(e) of this Part. The VOC content limits for Class B coating lines can be met by averaging the VOC content of the materials used on a single surface coating unit each day ('i.e.', daily within- coating unit averaging).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration



Effective between the dates of 08/19/2016 and 08/18/2026

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

Item 11.1:

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

Emission Unit: 1-MZLAB

Emission Unit: 1-ROTAM

Emission Unit: 1-TKDP1

Emission Unit: U-CLAD1

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A lesser degree of control has been established per Part 228-1.5(e) for eight specific coatings (958-203, 958-207, 958-303, E-333, GP 1904, RTM 9356, Polane G Plus, and Heresite P413C/Ethanol) used at the Metal Cladding, Inc. facility. Metal Cladding submitted a detailed process-specific Reasonably Available Control Technology (RACT) analysis dated October 2, 2015 which was completed in accordance with the "NYSDEC DAR-20 Economic and Technical Analysis for Reasonably Available Control Technology (RACT)" policy and 6NYCRR Part 228-1.5(e).

All of the coatings are used for Class B - Miscellaneous Metal Parts coating purposes. Heresite falls within the "extreme performance" coating category, which has a baked compliant coating limit of 3.0 lb VOC/gal. The other specific non-compliant coatings fall within the "heat resistant" coating category, which has a baked compliant coating limit of 3.0 lb VOC/gal.

The RACT analysis successfully demonstrated the technical and economic infeasibility of controlling volatile organic compound (VOC) emissions from these eight specific coatings via 1.) utilizing compliant coatings, 2.) utilizing demonstrated and proven control techniques including limiting VOC content and use of high transfer efficiency spray guns and 3.) utilizing add-on control technology such as thermal oxidation, condensation, absorption, and carbon adsorption. Only three of the techniques (thermal oxidation, absorption, and carbon adsorption) were determined to be technically feasible.



The economic feasibility analyses for the three technically feasible options showed a cost of control of approximately \$8600 to \$112,000 respectively per ton, which are twice to 22 times the cost feasibility threshold.

Since completion of the RACT analysis, Metal Cladding has committed to cease use of the non-compliant Heresite coating by December 31, 2016. The Heresite supplier is altering the formulation of the product to make it a compliant and formaldehyde-free coating and expects the new formulation to be available for the end of 2016.

To maintain compliance with the process-specific VOC RACT requirements, Metal Cladding shall:

- Adhere to the general operating practices in 6NYCRR Part 228-1.3,
- Continue to assess the feasibility of using an alternative low-VOC substitute coating or non-VOC reducer,
- Maintain documentation of the reason(s) why compliant coatings were not used, and
- Maintain records documenting the total annual emissions of VOC from non-compliant coatings used on a rolling 12-month basis.

Emissions subject to this RACT requirement shall be calculated using a combination of material usage and production records of material processed by the equipment. The facility shall submit an annual emission report for the previous calendar year to the Department by January 30th of each year. The report must include the monthly emissions and total emissions attributed to the non-compliant coatings for each rolling 12-month period throughout the calendar year.

Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request. The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved RACT evaluation. The first re-evaluation will be due no later than five years from the permit issuance date.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 12 calendar month(s).





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

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 12: Contaminant List
Effective between the dates of 08/19/2016 and 08/18/2026

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: 000050-00-0
Name: FORMALDEHYDE

CAS No: 000100-42-5
Name: STYRENE

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

Condition 13: Malfunctions and start-up/shutdown activities



Effective between the dates of 08/19/2016 and 08/18/2026

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 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 14: Emission Unit Definition

Effective between the dates of 08/19/2016 and 08/18/2026

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: 1-MZLAB

Emission Unit Description:

This emission unit represents ZC and MZ spray booths and

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ovens. The MZ oven, emission point 00022 and MZ spray booth, emission point 00045, the lab spray booth (emission point 00045) and lab oven (emission point 00046).

Building(s): 1
2

Item 14.2:

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

Emission Unit: 1-ROTAM

Emission Unit Description:

This emission unit consists of three (3) emission points associated with the rotary atomizer department. The emission points vent two automated spray application booths and one curing oven used in this department.

Building(s): 2

Item 14.3:

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

Emission Unit: 1-TKDP1

Emission Unit Description:

This emission unit represents the TK and DP spray booth and ovens: TK-5 spray booth/powder R&D booth (emission point 00029), theTK-2 oven (emission point 00035), Med/DP spray booth 1 (emission point 00037), Med/DP spray booth 2 (emission point 00038), TK Walk-In spray booth (emission point 00039), TK spray booth (emission point 00041), and TK Downdraft booth (emission point 00068).

Building(s): 1

Item 14.4:

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

Emission Unit: U-CLAD1

Emission Unit Description:

This emission unit consists of twelve (12) emission points associated with the cladding and former dip/spin departments. The emission points vent spray booths and curing ovens and also the application of Heresite coatings.

Building(s): 1
2

Item 14.5:

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

Emission Unit: U-MOLD1

Emission Unit Description:

This emission unit consists of two (2) emission points associated with the fiberglass reinforced plastic (FRP) molding and finishing operations. Both emission points

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vent FRP grinding booths used in this department.

Building(s): 2

Item 14.6:

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

Emission Unit: U-PLATE

Emission Unit Description:

This emission unit consists of one (1) emission point associated with the aqueous phosphate line operations. The emission point vents the various aqueous baths used in this department.

Building(s): 1

**Condition 15: Renewal deadlines for state facility permits
Effective between the dates of 08/19/2016 and 08/18/2026**

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

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 between the dates of 08/19/2016 and 08/18/2026**

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 9
270 Michigan Ave.
Buffalo, NY 14203

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Visible Emissions Limited



Effective between the dates of 08/19/2016 and 08/18/2026

Applicable State Requirement:6 NYCRR 211.2

Item 17.1:

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.

Condition 18: Compliance Demonstration

Effective between the dates of 08/19/2016 and 08/18/2026

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

Item 18.1:

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

Emission Unit: U-CLAD1 Emission Point: 00067
Process: FOR

Regulated Contaminant(s):
CAS No: 000050-00-0 FORMALDEHYDE

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Metal Cladding Inc. uses a coating, Heresite, which contains formaldehyde in the current formulation. The coating is expected to be reformulated without formaldehyde by the end of 2016. Regardless of the reformulation timing, Metal Cladding Inc. has committed to cease use of the formaldehyde-containing formulation by the end of 2016.

Per 6NYCRR Part 212-2.2 Table 2, Formaldehyde is a Highly Toxic Air Contaminant and is assigned an 'A' environmental rating. The continued use of the formaldehyde-containing formulation of Heresite until the end of 2016 required Metal Cladding to complete an air dispersion modeling analysis to determine if the maximum off-site formaldehyde concentration is less than the short-term and annual guidance concentrations for formaldehyde.

A Summary of Air Dispersion Modeling Analysis dated April 14, 2016 details the analysis performed by Golder Associates. The analysis indicated that the expected concentrations fell below the short-term guidance concentration threshold and within an acceptable range of

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the annual guidance concentration threshold.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 19: Emission Point Definition By Emission Unit Effective between the dates of 08/19/2016 and 08/18/2026

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1:

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

Emission Unit: 1-MZLAB

Table with 4 columns: Emission Point, Height (ft.), Diameter (in.), and Building. Rows include points 00022, 00023, 00045, and 00046 with their respective metrics.

Item 19.2:

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

Emission Unit: 1-ROTAM

Table with 4 columns: Emission Point, Height (ft.), Diameter (in.), and Building. Rows include points 00051, 00052, and 00065 with their respective metrics.



Item 19.3:

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

Emission Unit:	1-TKDP1		
Emission Point:	00029		
Height (ft.):	29	Diameter (in.):	19
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	1
Emission Point:	00035		
Height (ft.):	31	Diameter (in.):	6
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	1
Emission Point:	00037		
Height (ft.):	29	Diameter (in.):	24
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	1
Emission Point:	00038		
Height (ft.):	30	Diameter (in.):	18
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	1
Emission Point:	00039		
Height (ft.):	24	Diameter (in.):	24
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	1
Emission Point:	00041		
Height (ft.):	29	Diameter (in.):	12
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	1
Emission Point:	00068		
Height (ft.):	20	Diameter (in.):	30
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	1

Item 19.4:

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

Emission Unit:	U-CLAD1		
Emission Point:	00042		
Height (ft.):	22	Diameter (in.):	10
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	1
Emission Point:	00047		
Height (ft.):	26	Diameter (in.):	10
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	2
Emission Point:	00048		
Height (ft.):	24	Diameter (in.):	42
NYTMN (km.):	4786.1	NYTME (km.):	197.9
		Building:	2
Emission Point:	00050		



Emission Point: 00021
Height (ft.): 20 Diameter (in.): 24
NYTMN (km.): 4786.1 NYTME (km.): 197.9 Building: 1

Condition 20: Process Definition By Emission Unit
Effective between the dates of 08/19/2016 and 08/18/2026

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 20.1:

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

Emission Unit: 1-MZLAB
Process: MZL
Process Description:

This process encompasses the semi-automatic electrostatic spray application of VOC-based coatings on customer supplied parts. The parts are subsequently cured in ovens to set the coatings. The process results in the emission of VOCs and HAPs that are present in the coatings and solvents. Emissions occur primarily in the spray booths and to a lesser degree during the oven curing process. This process employs several coatings depending on customer specifications and the type of part being coated.

Emission Source/Control: EC045 - Control
Control Type: FABRIC FILTER

Emission Source/Control: EC023 - Process

Emission Source/Control: OV022 - Process

Emission Source/Control: OV046 - Process

Emission Source/Control: SPB23 - Process

Emission Source/Control: SPB45 - Process

Item 20.2:

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

Emission Unit: 1-ROTAM
Process: ROT
Process Description:

This process entails the automatic spray application of VOC based coatings on customer supplied parts. Emissions occur in two Nordson spray booths (emission points 00052 and 00065) and the Nordson curing oven (emission point 00065). This process employs several coatings, depending on the parts being coated.



Emission Source/Control: EC052 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: EC065 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: OV051 - Process

Emission Source/Control: SPB52 - Process

Emission Source/Control: SPB65 - Process

Item 20.3:

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

Emission Unit: 1-TKDP1

Process: TKD

Process Description:

This process encompasses the semi-automatic electrostatic spray application of VOC-based coatings on customer supplied parts. The parts are subsequently cured in ovens to set the coatings. The process results in the emission of VOCs and HAPs that are present in the coatings and solvents. Emissions occur primarily in the spray booths and to a lesser degree during the oven curing process. This process employs several coatings and involves coating of small batches of a wide variety of parts.

Emission Source/Control: EC029 - Control
Control Type: PAPER FILTER

Emission Source/Control: EC037 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: EC038 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: EC039 - Control
Control Type: PAPER FILTER

Emission Source/Control: EC041 - Control
Control Type: PAPER FILTER

Emission Source/Control: EC068 - Control
Control Type: PAPER FILTER

Emission Source/Control: OV035 - Process

Emission Source/Control: SPB29 - Process

Emission Source/Control: SPB37 - Process



Emission Source/Control: SPB38 - Process

Emission Source/Control: SPB39 - Process

Emission Source/Control: SPB41 - Process

Emission Source/Control: SPB68 - Process

Item 20.4:

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

Emission Unit: U-CLAD1

Process: CLA

Source Classification Code: 4-02-025-01

Process Description:

This process entails the manual spray application of VOC based coatings on customer supplied parts. The parts are subsequently cured in ovens to "set" the coatings. The process results in emission of VOCs and HAPs that are present in the coatings and solvents. Emissions occur in both the spray booths and the curing ovens. This process employs Heresite phenolic-based coatings and MEK, MIBK and methyl alcohol as diluents/cleaners.

Emission Source/Control: EC054 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: EC060 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: EC066 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: EC067 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: CLB60 - Process

Emission Source/Control: OV042 - Process

Emission Source/Control: OV047 - Process

Emission Source/Control: OV053 - Process

Emission Source/Control: OV055 - Process

Emission Source/Control: OV069 - Process

Emission Source/Control: SPB48 - Process

Emission Source/Control: SPB50 - Process

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Emission Source/Control: SPB54 - Process

Emission Source/Control: SPB66 - Process

Emission Source/Control: SPB67 - Process

Item 20.5:

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

Emission Unit: U-CLAD1

Process: FOR

Process Description:

The process entails the use of formaldehyde containing formulations of the Heresite brand coating. Metal Cladding Inc. has committed to cease using the formulation of this coating which contains formaldehyde by December 31, 2016.

Emission Source/Control: CLB60 - Process

Emission Source/Control: OV053 - Process

Emission Source/Control: SPB66 - Process

Emission Source/Control: SPB67 - Process

Item 20.6:

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

Emission Unit: U-MOLD1

Process: MOL

Source Classification Code: 3-08-007-22

Process Description:

The process entails the molding of fiberglass reinforced plastic (FRP) components using closed molding, manual lay-up and spray lay-up techniques. There are two associated grinding booths which have dedicated cyclones and vent to emission points 00061 and 00064.

Emission Source/Control: EC061 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: EC064 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: 00061 - Process

Emission Source/Control: 00064 - Process

Item 20.7:

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

Emission Unit: U-PLATE

Process: PLA

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Process Description:

This process entails the use of a phosphate line to clean parts and/or provide rust inhibition.

Emission Source/Control: P0021 - Process

Condition 21: Compliance Demonstration
Effective between the dates of 08/19/2016 and 08/18/2026

Applicable State Requirement:6 NYCRR 212-2.3 (b)

Item 21.1:

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

Emission Unit: U-CLAD1	Emission Point: 00060
Emission Unit: U-CLAD1	Emission Point: 00067
Emission Unit: U-MOLD1	Emission Point: 00061

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department.

A process emission source emitting an air contaminant and having an emission rate potential (ERP) of less than 0.1 pound per hour and an Environmental Rating of A must meet the annual and short term guideline concentrations for the air contaminant at the fenceline of the facility and be less than the PB trigger mass emission limit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

