

Facility DEC ID: 9291200247

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2912-00247/00001
Mod 0 Effective Date: 05/07/2013 Expiration Date: 05/06/2023
Mod 1 Effective Date: 07/03/2015 Expiration Date: 05/06/2023
Mod 2 Effective Date: 02/28/2020 Expiration Date: 05/06/2023
Mod 3 Effective Date: 08/16/2016 Expiration Date: No expiration date.

Permit Issued To: TAYLOR DEVICES INC
90 TAYLOR DR
PO BOX 748
NORTH TONAWANDA, NY 14120

Contact: DOUGLAS P TAYLOR
TAYLOR DEVICES, INC
90 TAYLOR DR
NORTH TONAWANDA, NY 14120

Facility: TAYLOR DEVICES INC - NORTH
1 BUFFALO BOLT WAY
NORTH TONAWANDA, NY 14120

Contact: KRISTIN WOLF
TAYLOR DEVICES INC
90 TAYLOR DR
NORTH TONAWANDA, NY 14120
(716) 694-0800

Description:
Taylor Devices manufactures products used to absorb, control, or mitigate the motion of masses. This motion may be transient, such as caused by earthquakes or explosions, or steady state, such as caused by vibration or controlled power excitation. Products include, but are not limited to, fluid dampers, shock absorbers, liquid springs, crane bumpers, etc. Emission sources consist of four spray booths, welding/brazing, grinding/sanding, and grit blasting/tumble blasting.

This permit modification represents the installation and operation of three additional spray booths. The facility will now bring the total spray booths to nine, however only two will operate at one time.

Toluene Emission Cap:

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This permit contains a federally enforceable emission cap to limit toluene, a hazardous air pollutant, to less than the 10 ton major source threshold during any consecutive twelve month period. This cap will establish the facility as a minor source and therefore not subject to the Title V permitting requirements of 6NYCRR, Part 201-6.

Surface Coating subject to 6NYCRR, Part 228-1:

Miscellaneous metal parts coating operations are subject to the requirements of 6NYCRR, Part 228-1 Table B4 “as applied” limits. The maximum permitted pounds of VOC per gallon (minus water and excluded VOC) of coating at application for miscellaneous metal parts coatings-extreme performance coatings is 3.5 lbs/gallon. These coatings are formulated for and exposed to harsh environmental conditions, including, but not limited to, continuous exposure to outside weather, temperatures consistently above 95°C, temperatures consistently below 0°C, solvents, detergents, abrasives, scouring agents or corrosive gases and fluids.

Since the facility potential to emit of volatile organic compounds (VOC) is less than 50 tons per year, the facility will not be subject to the “as applied” limits for those products which fall into the aerospace coating definitions. Aerospace coatings are defined as material applied to an aerospace vehicle or component to form a decorative, protective, functional solid film or the solid film itself.

The coating operations will also be subject to the opacity limits of Part 228-1.3(a) (1) and the particulate limits in Part 212-2.4(b) and (c). The 0.05 gr/dscf limit in Part 212-2.4(c) will be applicable to all particulate emissions with the exception of the fine aerosol MDI polymers which are subject to 212-2.1(a). These particles are assigned an ‘A’ environmental rating and are regulated by the control efficiency requirements in Table 4. Although emission rate potential is less than one pound per hour, the toxicity of isocyanates requires spray booth filters capable of containing fine particles less than 10 microns.

Exempt sources:

Exempt sources are those welding/brazing, grinding/sanding, and grit/tumble blastings which are exempt from permitting requirements but still subject to the 0.05 grain/dscf concentration limits in Part 212-2.4(c) and the opacity limits of Part 212-1.6.

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.

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Permit Administrator:

MARK F PASSUITE
NYSDEC - REGION 9
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature:

Date: ___ / ___ / _____

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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

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Condition 2-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 2-1.1:

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

Item 2-1.2:

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

Item 2-1.3

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

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

Item 4.1:

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

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

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

Condition 2-2: Submission of application for permit modification or renewal-REGION 9

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 2-2.1:

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

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Buffalo, NY 14203-2915
(716) 851-7165

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

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Facility: TAYLOR DEVICES INC - NORTH
1 BUFFALO BOLT WAY
NORTH TONAWANDA, NY 14120

Authorized Activity By Standard Industrial Classification Code:
3593 - FLUID POWER CYLINDERS AND ACTUATORS

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EU=1-PAINT,Proc=TNK

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NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

Mod 2/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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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

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Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1-1: Exempt Sources - Proof of Eligibility
Effective between the dates of 07/03/2015 and 05/06/2023

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

Item 1-1.1:

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 1: Exempt Sources - Proof of Eligibility
Effective between the dates of 05/07/2013 and 05/06/2023

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

Item 1.1:

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 this Subpart. 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 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.

Condition 2: Exempt Activities - Maintenance of Control Equipment
Effective between the dates of 05/07/2013 and 05/06/2023

Applicable Federal Requirement:6 NYCRR 201-3.2 (b)

Item 2.1:

Owner of any emission source or unit that is listed as eligible to be exempt in 6 NYCRR Part 201-3.2(c), on the basis of the use of appropriate emission control device shall operate and maintain such device in a manner consistent with good engineering practices.

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Condition 3: Trivial Activities - Maintenance of Control Equipment
Effective between the dates of 05/07/2013 and 05/06/2023

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

Item 3.1:

The owner and /or operator of any emission source or unit that is listed as eligible to be trivial in 6 NYCRR Part 201-3.3(c), on the basis of the use of appropriate emission control device shall operate and maintain such device in a manner consistent with good engineering practices.

Condition 4: Trivial Activities - (c)(52)
Effective between the dates of 05/07/2013 and 05/06/2023

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

Item 4.1:

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

Condition 2-1: Non Applicable requirements
Effective between the dates of 02/28/2020 and 05/06/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (g)

Item 2-1.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

(From Mod 2) 6 NYCRR 228-1.4 (e)

Reason: This facility has a VOC potential to emit that exceeds the 50 tons per year threshold in Table 1 of 6NYCRR Part 228-1.1 for Class E coating lines. The compliant coating requirements for Class E aerospace coating lines will not be included in this permit because the facility has taken a cap limiting toluene emissions to less than 10 tons per year. This also serves to limit the overall potential of VOCs that can be emitted to below 50 tons per year.

Condition 6: Capping Monitoring Condition
Effective between the dates of 05/07/2013 and 05/06/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 6.1:

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

6 NYCRR 201-6.1

Item 6.2:

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

Item 6.3:

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

Item 6.4:

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

Item 6.5:

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

Item 6.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000108-88-3 TOLUENE

Item 6.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility-wide potential emissions of toluene, a hazardous air pollutant, are to be limited to less than 10 tons during any twelve consecutive month period (determined on a rolling basis) in order to establish the facility as a minor source and therefore avoid the Title V permitting requirements of 6NYCRR, Part-201-6. The toluene content of all coatings and solvents are to be used to calculate this rolling total, i.e. for each month the emissions of the

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current month plus the 11 previous months are summed. Records of the emissions calculations for each month and the calculation of the 12-month rolling total of emissions for each month are to be maintained on-site for a period of five years. These records shall be in a format easily verifiable and made available to Department representatives on request during reasonable business hours for the purpose of determining compliance.

An annual certification is to be submitted verifying compliance with the emissions cap for each consecutive twelve month period of the calendar year. The report is to be submitted within 30 days after the end of the reporting period.

Parameter Monitored: TOLUENE

Upper Permit Limit: 9.9 tons

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 18: Visible Emissions Limited
Effective between the dates of 05/07/2013 and 05/06/2023

Applicable Federal Requirement:6 NYCRR 211.2

Item 18.1:

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 8: Compliance Demonstration
Effective between the dates of 05/07/2013 and 05/06/2023

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 009016-87-9

ISOCYANIC ACID,POLYMETHYLENEPOLYPHENYLENE ESTER

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

For coating products containing polymeric isocyanates, the fine particulate aerosols generated through spraying of coatings will receive an 'A' environmental rating and be subject to the control requirements of 6NYCRR, Part 212.9 Table 2. The short term and annual guidance concentrations for MDI polymer is 75 ug/m³ and 0.6 ug/m³ respectively. Based on the potential emission rate of 1394 pounds per year and the hourly emission rate of 0.16 pounds, impacts are within both the SGC (short-term) and AGC (annual) based on guidelines AERSCREEN and ISCLT modeling results.

The facility shall at all times employ spray booth filters having efficiencies sufficient to capture fine particulate aerosols generated during the coating process. The two-stage filter system proposed comprised of an inner filter manufactured by Tri-Dim and having efficiencies ranging from 50% to 99%+ for particles sizes in the 2.6 to less than 10 micron range is sufficient to control these fine particles. Proper spray application techniques shall be utilized to minimize overspray and the production of polymeric MDI aerosols.

Records shall be maintained identifying filter type, manufacturer, efficiency, and quantity of MDI coatings used at the facility. A change in the current filter system used shall be documented and an equivalent filter system employed. These records shall be kept on-site for a minimum of 5 years and be made available to Department representatives upon request during reasonable business hours.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-2: Compliance Demonstration**Effective between the dates of 07/03/2015 and 05/06/2023****Applicable Federal Requirement: 6 NYCRR 212.4 (c)****Item 1-2.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

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

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Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Compliance with this standard shall be demonstrated through the visible emissions limitations incorporated into this permit under 6NYCRR, Part 228-1.3(a).

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-3: Once in always in
Effective between the dates of 07/03/2015 and 05/06/2023

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

Item 1-3.1:

Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

Condition 1-4: Compliance Demonstration
Effective between the dates of 07/03/2015 and 05/06/2023

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

Item 1-4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Subpart.

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The permittee shall conduct a weekly visible emissions (VE) survey of the spray booth exhaust(s) when operating. If visible emissions and/or fallout are observed, the permittee shall replace the affected spray booth filters. A visible emissions survey will then be conducted on start-up of that booth and if visible emissions are still observed, the booth shall be shut-down for maintenance until such time that there are no visible emissions or fall-out observed on start-up.

The permittee shall keep records of all visible emissions evaluations, indicating the presence or absence of VE's and/or fallout and any subsequent required maintenance activities.

Compliance with this condition will serve to demonstrate compliance with the particulate emission standard of 6NYCRR, Part 212.4(c) for non-MDI/TDI coatings which prohibits particulate emissions in excess of 0.05 gr/dscf.

This Department reserves the right to perform or require the performance of an EPA Method 9 opacity evaluation at any time.

Parameter Monitored: OPACITY
 Upper Permit Limit: 20 percent
 Reference Test Method: Method 9
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 6 MINUTE AVERAGE
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-5: Compliance Demonstration
Effective between the dates of 07/03/2015 and 05/06/2023

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

Item 1-5.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The permittee owns/operates a Class B coating line for miscellaneous metal parts as described in 6NYCRR, Part

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228-1.1(a)(1) Table 1. The annual actual volatile organic compounds (VOCs) from all sources at this facility regardless of process type but excluding combustion installations, exceeds 3 tons. Therefore, the coating operations are subject to the “as applied” limits in 228-1.4(b)(4) Table B4 for miscellaneous metal parts. The maximum permitted pounds of VOC per gallon minus water and excluded VOC of coating at application for extreme performance coatings is 3.5 pounds per gallon, air-dried.

The “as applied” limit does not apply to aerospace coating lines which are listed as Class B because VOC emissions are less than 50 tons. Aerospace coatings are defined as a material applied to an aerospace vehicle or component to form a decorative, protective, functional solid film.

Aerospace coatings which are utilized for “pretreatment, adhesive bonding primers, flight testing, fuel tanks, electric/radiation effects, space vehicles and temporary mechanical maskant/high temperature heat treatment” are exempt from Part 228-1.4(e)(3).

As per 6NYCRR, Part 228-1.6(a), the owner or operator of any emission source subject to this Subpart must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each "as applied" coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the Department.

The "as applied" VOC content is determined by Equation 1 as defined in Part 228-1.2(b)(125).

The owner and operator of any emission source subject to this Part must, upon request by the Department, use Method 24 as presented in Appendix A of both 40 CFR Parts 63 and 60, respectively, to measure the volatile content, water content, density, volume of solids, and weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration. Alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

Representatives of the department must be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with

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this Subpart.

Any information or record showing noncompliance with the requirements of this Part must be reported to the department within 30 days following notice or generation of the information or record.

All records required must be maintained at the facility for a period of five years.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: PAINT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: Method 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 1-6: Surface Coating - Handling, storage and disposal
Effective between the dates of 07/03/2015 and 05/06/2023

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

Item 1-6.1:

This Condition applies to Emission Unit: 1-PAINT

Item 1-6.2:

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

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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 1-7: Compliance Demonstration
Effective between the dates of 07/03/2015 and 05/06/2023

Applicable Federal Requirement: 6 NYCRR 212.4 (b)

Item 1-7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT
 Process: TNK

Regulated Contaminant(s):
 CAS No: 0NY090-00-0 OIL MIST

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A hot oil dip tank used to size metal parts is currently vented indoors. If the permittee chooses to vent this unit outside the building, it shall be fitted with a mist eliminator to prevent potential fall-out.

A 30-day advance notification letter should be submitted to this Department prior to making any changes and the new emission point incorporated into the ASF permit renewal.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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STATE ONLY ENFORCEABLE CONDITIONS

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department

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will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

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 14: Contaminant List

Effective between the dates of 05/07/2013 and 05/06/2023

Applicable State Requirement:ECL 19-0301

Item 14.1:

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

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 009016-87-9
Name: ISOCYANIC ACID,POLYMETHYLENEPOLYPHENYLENE ESTER

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

CAS No: 0NY090-00-0
Name: OIL MIST

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

Condition 15: Malfunctions and start-up/shutdown activities
Effective between the dates of 05/07/2013 and 05/06/2023

Applicable State Requirement: 6 NYCRR 201-1.4

Item 15.1:

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

(b) The facility owner or operator shall compile and maintain records of all equipment 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.

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Condition 16: Unavoidable noncompliance and violations
Effective between the dates of 05/07/2013 and 05/06/2023

Applicable State Requirement: 6 NYCRR 201-1.4

Item 16.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

- (a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.
- (b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.
- (c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.
- (d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.
- (e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns,

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malfunctions or upsets.

Condition 17: Emission Unit Definition
Effective between the dates of 05/07/2013 and 05/06/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1(From Mod 2):

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

Emission Unit: 1-PAINT

Emission Unit Description:

Emission Unit 1-Paint consists of room spray booths, used to apply coatings to a variety of parts. Only 2 booths operate at one time due to pressure limitations. The coatings to be applied consist of various primers and paints that may be mixed prior to application depending on part specifications. There is a product list in the attached calculations. The coatings as applied are subject to the VOC-content restrictions outlined in 6 NYCRR 228-1. The spray booths are vented outdoors through panel filters.

Building(s): Bldg2
 Bldg3

Condition 1-8: Renewal deadlines for state facility permits
Effective between the dates of 07/03/2015 and 05/06/2023

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

Item 1-8.1:

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 2-2: Compliance Demonstration
Effective between the dates of 02/28/2020 and 05/06/2023

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

Item 2-2.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2-2.2:

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:

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Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-9: Compliance Demonstration
Effective between the dates of 07/03/2015 and 05/06/2023

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

Item 1-9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-9.2:

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 1/30/2016.

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

Condition 7: Air pollution prohibited
Effective between the dates of 05/07/2013 and 05/06/2023

Applicable State Requirement:6 NYCRR 211.1

Item 7.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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**** Emission Unit Level ****

Condition 19: Process Definition By Emission Unit
Effective between the dates of 05/07/2013 and 05/06/2023

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 19.1(From Mod 2):

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

Emission Unit: 1-PAINT
Process: SPO Source Classification Code: 4-02-025-01

Emission Source/Control: PSV01 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV02 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV03 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV04 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV05 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV06 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV07 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV08 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV09 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00001 - Process

Emission Source/Control: 00002 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00004 - Process

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Emission Source/Control: 00005 - Process

Emission Source/Control: 00006 - Process

Emission Source/Control: 00007 - Process

Emission Source/Control: 00008 - Process

Emission Source/Control: 00009 - Process

Item 19.2(From Mod 2):

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

Emission Unit: 1-PAINT

Process: TNK

Source Classification Code: 4-02-888-01

Process Description:

Oil dip tank used for heat sizing parts to decrease the amount of expansion and contraction that occur when installed into an industrial shock absorber. Emissions are fugitive with no direct vent.

Emission Source/Control: 0TANK - Process

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