



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-5620-00027/00155
Mod 0 Effective Date: 01/24/2018 Expiration Date: 01/23/2028
Mod 1 Effective Date: 04/23/2019 Expiration Date: 01/23/2028

Permit Issued To: PRESTOLITE ELECTRIC INCORPORATED
LEECE-NEVILLE HEAVY DUTY PRODUCTS DIV
400 MAIN ST
ARCADE, NY 14009-1109

Contact: JIM BODENSTEINER
PRESTOLITE ELECTRIC INC
400 MAIN ST
ARCADE, NY 14009
(716) 492-1700

Facility: PRESTOLITE ELECTRIC NY INC
400 MAIN ST
ARCADE, NY 14009

Description:

(1) Prestolite manufactures large and small frame alternators, large starter motors and electro-mechanical instruments. The facility is located at 400 Main Street, Arcade, New York.

(2) This permit action is a minor project that includes removal of facility operations and permit conditions associated with Emission Units P-00004 and P-00005. In addition, this minor permit modification updates operations associated with Emission Units P-00001 and P-00009.

(3) Prestolite permanently shut-down the aluminum die-casting operation on December 21, 2017. The associated source identifications removed from the permit include: Emission Unit P-00004; Process DCP; Emission Points 00156, 00173, and 00638; and Emission Sources CAST1, CAST2 and CAST5. The 6 NYCRR Part 212 permit condition for Emission Unit P-00004, which limited the lubricating oil usage from the die casting process to 250 gallons per year, was removed from the permit.

(4) Prestolite permanently shut-down the reverberatory, gas fired furnaces used to melt down clean aluminum stock in year 2018. The associated source identifications removed from the permit include: Emission Unit P-00005; Process FUR; Emission Points 00510 and 00514; and Emission Sources SHAEF and WARWI. The 6 NYCRR Part 212 permit condition for Emission Unit P-00005, which limited the aluminum



usage from the reverberatory furnaces to 480 tons per year, was removed from the permit.

(5) Emission Unit P-00001, Process SVP was corrected to reflect actual conditions. Specifically, the roll-dip varnish oven was listed as discharging to the outdoor atmosphere through three (3) separate emission points. This was corrected since the varnish oven exhausts through three (3) separate ducts that converge to a single discharge point to the outdoor atmosphere. This permit modification removes Emission Points 00326 and 00335 from the permit and lists Emission Point 00333 as the exhaust point for this source.

(6) Permit conditions associated with Emission Unit P-00009 were updated based on emission testing completed under the direction and guidance of the United States Environmental Protection Agency (USEPA). A diesel fuel-fired stationary reciprocating internal combustion engine used to test starter motors manufactured at the facility was tested in accordance with 40 CFR 60, New Source Performance Standards, Subpart III. The resulting determination received from the USEPA, dated May 31, 2016, stated any newly installed engines owned and operated by Prestolite that become stationary sources (by remaining at the facility for 12 or more consecutive months) will be subject to the emission testing and certification requirements of 40 CFR Part 60 Subpart III.

(7) Prestolite maintains the facility-wide emission limits that require total volatile organic compounds (VOC) not equal or exceed 90,000 pounds per year (lbs/yr), total hazardous air pollutants (HAP) not equal or exceed 45,000 lbs/yr, and Methyl Isobutyl Ketone not equal or exceed 18,000 lbs/yr as determined by summing the individual monthly emissions during any consecutive 12-month period.

(8) Prestolite maintains the 50 ton per year NO_x emission limit for emission unit P-00009 used to avoid applicability with 6NYCRR Part 231-2, New Source Review and the NO_x RACT requirements of 6NYCRR Part 227-2 when the emission unit was newly permitted in June, 2004.

(9) Prestolite maintains the VOC emission reduction credit (ERC) limit for emission unit P-00001, process SVP. Total VOC emissions from the conveyORIZED varnish operation, shall not exceed 28,800 lbs/yr as determined by summing the individual monthly emissions during any consecutive 12-month period. In addition, any future VOC emissions from the two discontinued vapor degreasers (emission points 00354 and 00600) are prohibited.

(10) Prestolite operates Class B Miscellaneous Metal Parts coating lines subject to 6NYCRR Part 228-1. The coating category for the processes are identified as an Extreme Performance (Air Dried) category and an Electric-Insulating Varnish category. In accordance with Table B4 of 6 NYCRR Subpart 228-1.4(b)(4), the coating VOC limit for these coatings is 3.5 pounds of VOC per gallon of coating (minus water and excluded compounds) at application.



(11) Prestolite maintains the 6NYCRR Part 212-2 process source material usage limits, as follows:

- (a) limit solder bar usage to 2,500 pounds per year; and
- (b) limit solder flux usage to 480 gallons per year.

(12) The renewal application for this Air State Facility Permit must be submitted to the department at least 180 days, but not more than 18 months, prior to the date of permit expiration. While the renewal application is being processed by the department, the owner or operator of the facility may continue to operate under the terms and conditions of the existing permit, provided the application is submitted in accordance with 6NYCRR Part 201-5.2(c).

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: MARK F PASSUITE
 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 separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

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

Item 3.3

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



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: 9-5620-00027/00155

Facility DEC ID: 9562000027



Permit Under the Environmental Conservation Law (ECL)

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

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Facility: PRESTOLITE ELECTRIC NY INC
400 MAIN ST
ARCADE, NY 14009

Authorized Activity By Standard Industrial Classification Code:
3679 - ELECTRONIC COMPONENTS, NEC

Mod 0 Permit Effective Date: 01/24/2018

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LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

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- 2 6 NYCRR 202-1.1: Required Emissions Tests
- 1-1 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 4 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *6 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *7 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 33 6 NYCRR 211.2: Visible Emissions Limited
- 1-2 6 NYCRR 212-1.6 (a): Compliance Demonstration
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- 1-5 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 13 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 14 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 15 6 NYCRR 228-1.3 (e): Surface coating application requirements
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Emission Unit Level

EU=P-00001,Proc=SVP

- *22 6 NYCRR Subpart 201-7: Capping Monitoring Condition

EU=P-00003

- 36 6 NYCRR Subpart 212-2: Compliance Demonstration
- 37 6 NYCRR Subpart 212-2: Compliance Demonstration

EU=P-00006

- 40 6 NYCRR Subpart 212-2: Compliance Demonstration

EU=P-00009

- *1-7 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 24 6 NYCRR 225-1.2 (h): Compliance Demonstration
- 25 6 NYCRR 227-1.3 (a): Compliance Demonstration
- 1-8 40CFR 60, NSPS Subpart III: Compliance Demonstration
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EU=P-00012

- 41 6 NYCRR Subpart 212-2: Compliance Demonstration

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- 28 ECL 19-0301: Contaminant List
- 29 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

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- 30 6 NYCRR Subpart 201-5: Emission Unit Definition
- 31 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
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- 8 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 34 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 35 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



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: Open Fires - Prohibitions
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement: 6 NYCRR 215.2

Item 1.1:

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

Item 1.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.



- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

Condition 2: Required Emissions Tests
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 2.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 1-1: Non Applicable requirements
Effective between the dates of 04/23/2019 and 01/23/2028

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

Replaces Condition(s) 3

Item 1-1.1:

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 1) 40 CFR Part 63, Subpart HHHHHH
Reason: 40 CFR 63 Subpart HHHHHH – Paint Stripping and Miscellaneous Surface Coating Operations at Area Source: Prestolite has reported they do not coat motor vehicles or mobile equipment, do not use methylene chloride containing paint stripping products, and do not use spray coatings that contain the targeted HAPS. Therefore, Prestolite has reported they are not subject to this NESHAP.

40 CFR Part 63, Subpart JJJJJJ
Reason: 40 CFR 63 Subpart JJJJJJ – Industrial, Commercial and Institutional Boilers at Area Sources:



Prestolite has reported they are not subject to this NESHAP since the facility boilers are natural gas fired and, therefore, exempt.

40 CFR Part 63, Subpart WWWWWW

Reason: Prestolite Electric, Inc. (Prestolite) has submitted documentation indicating facility operations in emission unit P00012 are not subject to 40 CFR 63, Subpart WWWWWW – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations (Subpart WWWWWW).

In accordance with 40 CFR §63.11504 (Am I subject to this subpart?), Prestolite operates a zinc phosphate plating tank (tank #8) which meets the definition of electroless or non-electrolytic plating as given in §63.11511. Additionally, the facility uses or has emission of compounds of one or more of the regulated plating metal Hazardous Air Pollutants (HAPs) such as cadmium, chromium, lead, manganese, and nickel within the plating tank.

Tank #8 uses PermaGard 3096 in a dilute solution of 4 to 6%. The Material Safety Data Sheet (MSDS) for PermaGard 3096 indicates nickel nitrate is a component at a concentration of 0.1 to 1.5 weight percent. Therefore, based on the highest percentages, the nickel content in the diluted final bath solution is less than the regulatory threshold of 0.1 weight percent (i.e., nickel content of PermaGard 3096 (1.5 weight percent), multiplied by the highest PermaGard concentration in the bath (6%) = 0.09%). Prestolite indicates that the nickel content in the diluted final bath solution is less than the regulatory threshold of 0.1 weight percent and Prestolite is not subject to Subpart WWWWWW requirements.

40 CFR Part 63, Subpart XXXXXX

Reason: Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories: Prestolite is not subject to this NESHAP since the facility SIC code of 3679 and NAICS code of 334419 are not applicable categories.

40 CFR Part 63, Subpart ZZZZZZ

Reason: 40 CFR 63 Subpart ZZZZZZ – Aluminum, Copper and Other Nonferrous Foundries at Area Sources: Prestolite no longer operates die casting operations at this facility. Prestolite was never subject to this NESHAP since the facility only used molten aluminum for die casting; which is exempt from this regulation.

New York State Department of Environmental Conservation

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Facility DEC ID: 9562000027



Condition 4: Facility Permissible Emissions
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 4.1:

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

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

per year	CAS No: 000108-10-1 (From Mod 1)	PTE: 18,000 pounds
	Name: 2-PENTANONE, 4-METHYL	
per year	CAS No: 0NY100-00-0 (From Mod 1)	PTE: 45,000 pounds
	Name: TOTAL HAP	
per year	CAS No: 0NY210-00-0 (From Mod 1)	PTE: 190,000 pounds
	Name: OXIDES OF NITROGEN	
per year	CAS No: 0NY998-00-0 (From Mod 1)	PTE: 90,000 pounds
	Name: VOC	

Condition 5: Capping Monitoring Condition
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 5.1:

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

6 NYCRR Subpart 201-6

Item 5.2:

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

Item 5.3:

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

New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00155

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Item 5.4:

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

Item 5.5:

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

Item 5.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

FACILITY-WIDE TOTAL VOC LIMIT

(1) Facility-wide emissions of total volatile organic compounds (VOC) from all emission sources, including exempt and trivial activities, shall not equal or exceed 90,000 pounds per year (lbs/yr) as determined by summing the individual monthly emissions during any consecutive 12-month period. The facility has accepted this limitation to avoid applicability to Title V permitting, NYCRR Part 201-6.

(2) On-going compliance monitoring of the total VOC emission limit shall be documented based on monthly emission calculations, as determined by summing the individual monthly emissions during any consecutive 12-month period.

(3) Prestolite shall estimate the emissions of VOC by utilizing purchase records, MSDS information, and/or emission factors. All VOCs present shall be assumed to be emitted to the atmosphere.

(4) The following or similar information shall be maintained to demonstrate the emission calculations are verifiable and enforceable:



- (a) a current list of all VOC containing or producing products in use throughout the facility. This list must include: information on the manufacturer, brand, product name or code, VOC content, or other manufacturer's product specifications, material content reports or laboratory analyses providing this information;
- (b) a monthly log of the purchase of each VOC product (including solvents used in clean up and surface preparation), and calculations showing compliance with the emission limits; and
- (c) all purchase orders, invoices, and other documents to support information in the monthly log.

(5) Records shall be maintained for five years and be made available upon request.

Parameter Monitored: VOC

Upper Permit Limit: 90000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 6: Capping Monitoring Condition
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 6.1:

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

6 NYCRR Subpart 201-6

Item 6.2:

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

Item 6.3:

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

Item 6.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an

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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: 000108-10-1 2-PENTANONE, 4-METHYL

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 METHYL ISOBUTYL KETONE (MIK) LIMIT
[MIK also known as 2-PENTANONE, 4-METHYL]

(1) Facility-wide emissions of Methyl Isobutyl Ketone (Cas No. 000108-10-1) from all emission sources, including exempt and trivial activities, shall not equal or exceed 18,000 pounds per year (lbs/yr) as determined by summing the individual monthly emissions during any consecutive 12-month period. The facility has accepted this limitation to avoid applicability to Title V permitting, NYCRR Part 201-6.

(2) On-going compliance monitoring of the MIK emission limit shall be documented based on monthly emission calculations, as determined by summing the individual monthly emissions during any consecutive 12-month period.

(3) Prestolite shall estimate the emissions of MIK by utilizing purchase records, MSDS information, and/or emission factors. All MIK present shall be assumed to be emitted to the atmosphere.

(4) The following or similar information shall be maintained to demonstrate the emission calculations are verifiable and enforceable:

(a) a current list of all MIK containing or producing



products in use throughout the facility. This list must include: information on the manufacturer, brand, product name or code, MIK content, or other manufacturer's product specifications, material content reports or laboratory analyses providing this information;

(b) a monthly log of the purchase of each MIK product (including solvents used in clean up and surface preparation), and calculations showing compliance with the emission limits; and

(c) all purchase orders, invoices, and other documents to support information in the monthly log.

(5) Records shall be maintained for five years and be made available upon request.

Parameter Monitored: 2-PENTANONE, 4-METHYL

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 7: Capping Monitoring Condition
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 7.1:

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

6 NYCRR Subpart 201-6

Item 7.2:

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

Item 7.3:

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 7.4:

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

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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 7.5:

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 7.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 7.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

FACILITY-WIDE TOTAL HAP LIMIT

(1) Facility-wide emissions of total hazardous air pollutants (HAP) from all emission sources, including exempt and trivial activities, shall not equal or exceed 45,000 pounds per year (lbs/yr) as determined by summing the individual monthly emissions during any consecutive 12-month period. The facility has accepted this limitation to avoid applicability to Title V permitting, NYCRR Part 201-6.

(2) On-going compliance monitoring of the total HAP emission limit shall be documented based on monthly emission calculations, as determined by summing the individual monthly emissions during any consecutive 12-month period.

(3) Prestolite shall estimate the emissions of HAP by utilizing purchase records, MSDS information, and/or emission factors. All HAPs present shall be assumed to be emitted to the atmosphere.

(4) The following or similar information shall be maintained to demonstrate the emission calculations are verifiable and enforceable:

(a) a current list of all HAP containing or producing products in use throughout the facility. This list must include: information on the manufacturer, brand, product name or code, HAP content, or other manufacturer's product



specifications, material content reports or laboratory analyses providing this information;

(b) a monthly log of the purchase of each HAP product (including solvents used in clean up and surface preparation), and calculations showing compliance with the emission limits; and

(c) all purchase orders, invoices, and other documents to support information in the monthly log.

(5) Records shall be maintained for five years and be made available upon request.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 45000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 33: Visible Emissions Limited
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement:6 NYCRR 211.2

Item 33.1:

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 1-2: Compliance Demonstration
Effective between the dates of 04/23/2019 and 01/23/2028

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

Replaces Condition(s) 9

Item 1-2.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PROCESS SOURCES
PART 212 - OPACITY LIMIT

(1) As required by 6NYCRR Part 212-1.6(a), 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.

(2) Compliance with this requirement shall be determined by the facility owner/operator conducting a routine survey of visible emissions when a process is in operation. Visible emissions are not expected when properly operated. If any visible emissions are identified, inspect the source and restore operation of the emission unit (including the control device, if any, and the associated capture system) to its normal operation as expeditiously as practicable.

(3) Records of any visible emission event shall be maintained to include: (1) date and length of time any visible emissions were observed, (2) the corrective action taken, and (3) the length of time the source was out of service or operating with visible emissions. The records shall be kept on-site and made available to the Department upon request.

(4) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation from any process emission source.

(5) Upon request, a written report of any visible emission event shall be submitted to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-3: Compliance Demonstration
Effective between the dates of 04/23/2019 and 01/23/2028

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

Replaces Condition(s) 10

Item 1-3.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:



PROCESS SOURCES
PARTICULATE MATTER (PM) EMISSION LIMIT

The control of particulate emissions generated from the process sources are restricted as follows:

- (1) As required by 6NYCRR Part 212-2.4(b)(1), emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).
- (2) Compliance with this requirement shall be completed by operating and maintaining each dust collection system in accordance with manufacturer recommendations.
- (3) As per 212-1.7(a) 'Sampling and monitoring' section, facility owners and/or operators of a process emission source required by the department to demonstrate compliance with this Part may be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to Part 202 of this Title.
- (4) Maintenance records shall be kept on-site and be made available to the Department upon request.
- (5) Upon request, a written report of any malfunction of the control equipment shall be submitted to the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA 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 1-4: Compliance Demonstration
Effective between the dates of 04/23/2019 and 01/23/2028

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

Replaces Condition(s) 11

Item 1-4.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: P-00001

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Emission Unit: P-00002

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

**OPACITY LIMIT
SURFACE COATING PROCESSES**

(1) As specified in 6NYCRR part 228-1.3(a), the facility owner or operator shall not 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 surface coating process.

(2) Compliance with this requirement shall be determined by the facility owner/operator conducting a routine survey of visible emissions when a process is in operation. Visible emissions are not expected when properly operated. If any visible emissions are identified, inspect the source and restore operation of the emission unit (including the control device, if any, and the associated capture system) to its normal operation as expeditiously as practicable.

(3) Records of any visible emission event shall be maintained to include: (1) date and length of time any visible emissions were observed, (2) the corrective action taken, and (3) the length of time the source was out of service or operating with visible emissions. The records shall be kept on-site and made available to the Department upon request.

(4) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation from any process emission source.

(5) Upon request, a written report of any visible emission event shall be submitted to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: MONTHLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-5: Compliance Demonstration

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Effective between the dates of 04/23/2019 and 01/23/2028

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

Replaces Condition(s) 12

Item 1-5.1:

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

Emission Unit: P-00001

Emission Unit: P-00002

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RECORDKEEPING
SURFACE COATING PROCESSES

(1) The owner or operator must maintain and, upon request, provide the department with a certification from the coating supplier/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 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 within 90 days of receiving the request.

(3) All records required by this paragraph must be maintained at the facility for a period of five years.

(4) Upon request, a report shall be submitted to the Department to document compliance with this requirement.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Surface Coating- Prohibitions

Effective between the dates of 01/24/2018 and 01/23/2028

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

Item 13.1:



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

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

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

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

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

Condition 14: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028

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

Item 14.1:

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

Emission Unit: P-00001

Emission Unit: P-00002

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

HANDLING, STORAGE AND DISPOSAL
OF VOLATILE ORGANIC COMPOUNDS
SURFACE COATING PROCESSES

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

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



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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 15: Surface coating application requirements
Effective between the dates of 01/24/2018 and 01/23/2028**

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

Item 15.1:

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;
- (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 1-6: Compliance Demonstration
Effective between the dates of 04/23/2019 and 01/23/2028

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

Replaces Condition(s) 16

Item 1-6.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: P-00001

Emission Unit: P-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

55 GALLON NON- COMPLIANT COATING LIMIT

(1) As stated in 6 NYCRR Part 228-1.3(e)(2), the facility may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4 of this Subpart.

(2) The facility must maintain records on an as-used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. If the exemption criteria are based on VOC usage, the records must contain calculations and supplier/manufacturer material data sheets for verification of VOC usage.

(3) All records must be maintained at the facility for a period of five years.



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(4) Upon request, a report shall be submitted to the Department to document compliance with this requirement.

Parameter Monitored: COATING

Upper Permit Limit: 55 gallons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED MORE THAN ONCE PER CALENDAR YEAR

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028

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

Item 17.1:

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

Emission Unit: P-00001

Emission Unit: P-00002

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

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

SURFACE COATING VOC RACT COMPLIANCE

(1) The facility operates Class B Miscellaneous Metal Parts coating lines. The coating category for the processes are identified as an Extreme Performance (Air Dried) category and an Electric-Insulating Varnish category.

(2) In accordance with Table B4 of 6 NYCRR Subpart 228-1.4(b)(4), the coating VOC limit for these coatings is 3.5 pounds of VOC per gallon of coating (minus water and excluded compounds) at application.

(3) Sampling and testing of any coating to confirm VOC content compliance must be performed in a manner directed by and at the request of the Department.



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Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 3.5 pounds per gallon
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement: 6 NYCRR 228-1.6 (a)

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 18.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Parameter Monitored: VOC CONTENT
Upper Permit Limit: 3.5 pounds per gallon
Reference Test Method: EPA RM 311 or 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: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 19: Surface coating access for sampling
Effective between the dates of 01/24/2018 and 01/23/2028



Applicable Federal Requirement:6 NYCRR 228-1.6 (c)

Item 19.1:

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

Condition 20: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement:6 NYCRR 228-1.6 (h)

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Condition 22: Capping Monitoring Condition
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 22.1:

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

6 NYCRR 231-2.6 (a)

Item 22.2:

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

Item 22.3:

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 22.4:

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 22.5:

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 22.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00001
Process: SVP

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

Item 22.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

VOC EMISSION REDUCTION CREDIT (ERC) LIMIT
EMISSION UNIT P-00001, PROCESS SVP

(1) On March 3, 1997, the Department certified Emission Reduction Credits (ERCs) created by Prestolite for reducing volatile organic compound (VOC) emissions from Emission Unit P-00001, Process SVP and for discontinuing the use of a vapor degreaser at emission point 00354. A total of 43.5 tons of VOC ERCs were sold to and used by Dart Container Corp of Pennsylvania. As part of the certification process, Prestolite was required to limit VOC emissions from Emission Unit P-00001, Process SVP to



less than 19,800 pounds for any consecutive 12-month period.

(2) On June 4, 2004, emission reduction credits of 4.5 tons per year or 9,000 pounds per year (lbs/yr) of VOC were certified by the Department for the elimination of an additional vapor degreaser at Emission Unit P-00007/Emission Point 00600. The ERCs were reassigned to Emission Unit P-00001, Process SVP to accommodate an increase in production and maintain the permanency of the original 43.5 tons of ERCs.

(3) Based on the above ERC transactions, Prestolite is required to maintain the following:

(a) Total VOC emissions from all emission sources associated with Emission Unit P-00001, Process SVP (the conveyorized varnish operation), shall not exceed 28,800 pounds per year as determined by summing the individual monthly emissions during any consecutive 12-month period.

(b) The two vapor degreasers (emission points 00354 and 00600) were permanently discontinued and any future VOC emissions from these processes are prohibited.

(4) VOC emission calculations from Emission Unit P-00001, Process SVP shall be completed on a monthly basis. Prestolite shall calculate actual VOC emissions by assuming all VOCs used in the process are emitted to the atmosphere. At a minimum, the VOC emissions shall include: (a) all VOC in the as-received coating, (b) VOCs added to the coating to adjust the flowing properties of the material, such as the viscosity or pH, and (c) VOCs used in cleaning or preparation.

(5) The calculations and supporting documentation shall be maintained and made available upon request.

Parameter Monitored: VOC

Upper Permit Limit: 28800 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 36: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement: 6 NYCRR Subpart 212-2

Item 36.1:

New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00155

Facility DEC ID: 9562000027



The Compliance Demonstration activity will be performed for:

Emission Unit: P-00003

Item 36.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

PART 212 EVALUATION
AUTOMATED SOLDERING MACHINES
SOLDER BAR USAGE LIMIT

- (1) Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point are restricted as specified in 6NYCRR Part 212-2. Air contaminants listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant (HTAC) List shall either not exceed the mass emission limit (MEL) listed or demonstrate compliance with the air cleaning requirements as 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.
- (2) The automated solder machines use a soldering bar that produces the HTAC lead. The actual lead emissions do not exceed the MEL of 5 pounds per year. To ensure facility emissions do not exceed the MEL of 5 pounds per year, the facility shall limit the solder bar usage to less than 2,500 pounds per year.
- (3) The facility shall keep 5 years up-to-date, readily accessible records of the solder bar usage. The records should be made available upon request.

Parameter Monitored: SOLDER

Upper Permit Limit: 2500 pounds per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 37: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement: 6 NYCRR Subpart 212-2

New York State Department of Environmental Conservation

Permit ID: 9-5620-00027/00155

Facility DEC ID: 9562000027



Item 37.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00003

Item 37.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

PART 212 EVALUATION
AUTOMATED SOLDERING MACHINES
SOLDER FLUX USAGE LIMIT

(1) The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the department.

(2) Emissions of the solder flux were calculated based on a maximum annual usage of 480 gallons. The emission rate potential of each non-HTAC greater than 100 pounds per year was evaluated in accordance with the DAR-1 program policy. The results of the analysis indicate potential off-site ambient impacts are below the guideline concentrations. As such, the facility solder flux usage shall be limited to 480 gallons per year.

(3) The facility shall keep 5 years up-to-date, readily accessible records of the solder flux usage. The records should be made available upon request.

Parameter Monitored: FLUX

Upper Permit Limit: 480 gallons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 40: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028



Applicable Federal Requirement:6 NYCRR Subpart 212-2

Item 40.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00006

Item 40.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

PART 212 EVALUATION
HEAT CLEAN OVENS
OPERATE AFTERBURNER AND
MONTIOR TEMPERATURE

- (1) The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the department.
- (2) The contaminants emitted from the heat cleaning oven were evaluated in accordance with the DAR-1 program policy. The analysis demonstrated the afterburner satisfies the control requirement of Table 4.
- (3) The facility shall operate the afterburner whenever the oven is in use. The temperature of the afterburner exhaust should operate at 1,400 degrees Fahrenheit or greater. The temperature of the afterburner exhaust shall be measured by in-stack continuous temperature monitoring and recording devices. The temperature devices shall be calibrated, maintained, and operated according to the manufacturer's specifications.
- (4) Keep 5 years up-to-date, readily accessible records of the temperature data, calibration, and maintenance activities.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION



Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-7: Capping Monitoring Condition
Effective between the dates of 04/23/2019 and 01/23/2028

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Replaces Condition(s) 23

Item 1-7.1:

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

6 NYCRR Subpart 227-2

6 NYCRR Subpart 231-2

Item 1-7.2:

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

Item 1-7.3:

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

Item 1-7.4:

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

Item 1-7.5:

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

Item 1-7.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00009

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 1-7.7:

Compliance Demonstration shall include the following monitoring:



Capping: Yes

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

Monitoring Description:

NO_x EMISSION LIMIT 50 TPY
EMISSION UNIT P-00009

(1) In June 2004, a new emission unit, identified as P-00009 was permitted for installation. Emission Unit P-00009 included the operation of starter motor and alternator test stands using diesel truck engines to run the starter motors manufactured at the facility. The potential NO_x emissions from the project exceeded the major source threshold of 100 tpy. The NO_x emissions from this emission unit were limited to below 50 tpy to avoid applicability with 6NYCRR Part 231-2, New Source Review and the NO_x RACT requirements of 6NYCRR Part 227-2.

(2) Oxides of Nitrogen (NO_x) emissions from Emission Unit P-00009 are limited to 50 tons per year (tpy) as determined by summing the individual monthly emissions during any consecutive 12-month period.

(3) The facility shall demonstrate compliance with this limit by monitoring NO_x emissions as follows:

(a) Prestolite shall monitor the time each starter test engine and alternator test engine is on and record the number of horsepower-hours that were accumulated each month.

(b) Prestolite shall calculate the monthly NO_x emissions from the process based on the maximum horsepower per engine, the actual engine running time, and the NO_x emission factor of 1.85E-02 lb NO_x/hp-hr, or other approved emission factor. The NO_x emission factor is from the Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling - Compression-Ignition, EPA420-P-02-016, dated November 2002.

(c) On a monthly basis, Prestolite shall compute the annual NO_x emission rate using a rolling 12-month period. The monthly and 12-month total emissions shall be recorded in a log and kept on site. This log shall be made available to the Department upon request.

(4) Records shall be maintained for five years and be made available upon request.

(5) An annual compliance certification shall be submitted to the DEC Region 9 Air Pollution Control Engineer no later than January 30 for the previous year. The certification shall indicate whether the facility has operated all emission units within the limits imposed by



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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.

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 50 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2020.
Subsequent reports are due every 12 calendar month(s).

Condition 24: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement: 6 NYCRR 225-1.2 (h)

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00009

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

SULFUR-IN-FUEL LIMIT

Owners and/or operators of any stationary combustion installation that fires distillate oil including number two heating oil are limited to the firing of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2016. Compliance with this limit will be based on vendor certifications.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 0.0015 percent by weight
Monitoring Frequency: PER DELIVERY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 25: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028



Applicable Federal Requirement:6 NYCRR 227-1.3 (a)

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00009

Item 25.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

OPACITY REQUIREMENT FOR COMBUSTION SOURCES

(1) As required by 6NYCRR Part 227-1.3(a), the facility owner or operator shall not operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.

(2) Compliance with this requirement shall be determined by the facility owner/operator conducting a survey of visible emissions whenever a process is in operation. If any visible emissions are identified, corrective action is required.

(3) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-8: Compliance Demonstration

Effective between the dates of 04/23/2019 and 01/23/2028

Applicable Federal Requirement:40CFR 60, NSPS Subpart IIII

Replaces Condition(s) 26

Item 1-8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00009

Regulated Contaminant(s):

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CAS No: 000630-08-0 CARBON MONOXIDE

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

NEW, COMPRESSION IGNITION ENGINES
DIESEL, BUILT AFTER APRIL 1, 2006
40CFR60 SUBPART IIII REQUIREMENTS

(1) Prestolite uses mobile diesel truck engines to conduct performance testing on the starter motors manufactured at the facility. Any truck engine that remains at the facility for more than 12 consecutive months is considered a stationary engine and is subject to the testing and certification requirements of 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (RICE).

(2) Under the direction and guidance of the United States Environmental Protection Agency (USEPA), Prestolite completed emission testing on one of the truck engines and received a compliance determination from the USEPA dated May 31, 2016.

(3) The USEPA determined no further emission testing is required for truck engines currently located at the facility that are subject to 40 CFR Part 60, Subpart IIII due to the nature in which Prestolite operates the engines.

(4) The USEPA further determined that newly installed engines owned and operated by Prestolite that become stationary sources (by remaining at the facility for 12 or more consecutive months) will be subject to the emission testing and certification requirements of 40 CFR Part 60 Subpart IIII.

(5) As such, prior to installing a new truck engine that is intended to remain at the facility for 12 or more consecutive months, Prestolite shall submit a permit modification and a compliance plan to the department for approval.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-9: Compliance Demonstration
Effective between the dates of 04/23/2019 and 01/23/2028



Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Replaces Condition(s) 27

Item 1-9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00009

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

EXISTING NON-EMERGENCY CI ENGINE AT AREA SOURCE
BUILT PRIOR TO JUNE 12, 2006

Prestolite uses mobile diesel truck engines to conduct performance testing on the starter motors manufactured at the facility. Any truck engine built prior to June 12, 2006 that remains at the facility for more than 12 consecutive months is considered a stationary engine and is subject to the following requirements of 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines:

- (1) Operate and maintain engine per manufacturer's instructions or owner-developed maintenance plan;
- (2) Change oil & filter every 1,000 hours or annually, whichever comes first;
- (3) May use oil analysis program specified in §63.6625(i) instead of prescribed oil change frequency;
- (4) Inspect air cleaner every 1,000 hours or annually and replace as necessary;
- (5) Inspect hoses and belts every 500 hours or annually and replace as necessary;
- (6) Keep records of maintenance;
- (7) Notifications not required;
- (8) Use Ultra low sulfur diesel (ULSD); and
- (9) Existing non-emergency CI >300 HP emission standards are not applicable during engine startup as long as the startup period does not exceed 30 minutes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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Condition 41: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable Federal Requirement:6 NYCRR Subpart 212-2

Item 41.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00012

Item 41.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

**PART 212 EVALUATION
ZINC PHOSPHATE PROCESS**

- (1) Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point are restricted as specified in 6NYCRR Part 212-2. Air contaminants listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant (HTAC) List shall either not exceed the mass emission limit (MEL) listed or demonstrate compliance with the air cleaning requirements as 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.
- (2) The zinc phosphate process produces the HTAC nickel. The actual nickel emissions do not exceed the MEL of 10 pounds per year. The phosphoric acid emissions were evaluated in accordance with the DAR-1 program policy. The results of the DAR-1 analysis indicate potential off-site ambient impacts of phosphoric acid are below the guideline concentrations.
- (3) The zinc phosphate tank solution is less than the regulatory threshold of 0.1 weight percent nickel and is not subject to 40 CFR 63 Subpart WWWW requirements. Records should be maintained to document the nickel solution content.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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 28: Contaminant List
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable State Requirement:ECL 19-0301

Item 28.1:

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

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

CAS No: 000630-08-0
Name: CARBON MONOXIDE

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

CAS No: 0NY100-00-0



Name: TOTAL HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

Name: VOC

Condition 29: Malfunctions and start-up/shutdown activities
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable State Requirement:6 NYCRR 201-1.4

Item 29.1:

(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 30: Emission Unit Definition



Effective between the dates of 01/24/2018 and 01/23/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 30.1(From Mod 1):

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

Emission Unit: P-00001

Emission Unit Description:

Emission Unit P-00001 includes a conveyORIZED varnish dip and oven dry surface coating operation identified as a Class B Miscellaneous Metal Parts coating process in 6 NYCRR Part 228-1.4(b). The coating category is listed in Table B4 as Electric-Insulating Varnish requiring a VOC content limit of 3.5 pounds per gallon.

On March 3, 1997 and June 4, 2004, the facility received emission reduction credits for reducing VOC emissions by using reformulated coatings. As part of the establishment of the emission reduction credits, Prestolite accepted a VOC emission limit of 28,800 pounds per year from this emission unit.

Building(s): MAIN

Item 30.2(From Mod 1):

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

Emission Unit: P-00002

Emission Unit Description:

Emission Unit P-00002 includes a roll dip varnish process, a varnish vacuum chamber, paint spray booths and a curing/drying oven for coating miscellaneous metal parts. The coating category for the processes are identified as an Extreme Performance (Air Dried) category and an Electric-Insulating Varnish category. In accordance with Table B4 of 6 NYCRR Subpart 228-1.4(b)(4), the coating VOC limit for these coatings is 3.5 pounds of VOC per gallon of coating (minus water and excluded compounds) at application.

The particulate emissions from the paint booth processes are controlled using filters and are regulated under 6NYCRR Part 212.

Building(s): MAIN

Item 30.3(From Mod 1):

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

Emission Unit: P-00004

Emission Unit Description:

Emission Unit P-00004 is no longer in operation. This process included an aluminum die casting operation. All the aluminum die casting machines were removed from the facility in the December 2017.



Building(s): MAIN

Item 30.4(From Mod 1):

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

Emission Unit: P-00005

Emission Unit Description:

Emission Unit P-00005 is no longer in operation. This process included the melting down of clean aluminum stock and internal scrap in two reverberatory, gas-fired furnaces. The Denton/Schaefer furnace and the Warwick furnace were shut down and removed from the facility in the year 2018.

Building(s): MAIN

Item 30.5(From Mod 1):

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

Emission Unit: P-00009

Emission Unit Description:

Emission Unit P-00009 includes the operation of Starter Motor and Alternator Test Stands by using mobile diesel truck engine to test the starter motors and alternators manufactured at the facility.

The emissions from the truck engines are uncontrolled. Exhaust gases from the truck engines are emitted through one common stack, identified as EP 00633.

Any truck engine that remains at the facility for more than 12 consecutive months is considered a stationary engine subject to the testing and certification requirements of 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (RICE) or 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, where applicable.

Nitrogen Oxide (NO_x) emissions from P-00009 are limited to 50 tons per year based on a 12-month rolling total calculation.

Building(s): MAIN

Item 30.6(From Mod 0):

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

Emission Unit: P-00003

Emission Unit Description:

Emission Unit P-00003 includes automated soldering operations for electrical components. The emissions from these sources are regulated by 6NYCRR Part 212.

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Building(s): MAIN

Item 30.7(From Mod 0):

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

Emission Unit: P-00006

Emission Unit Description:

Emission Unit P-00006 is a metal heat cleaning operation to remove paint, grease, oils, varnish, epoxy, and other residual materials from metal parts. The emissions from these sources are regulated by 6NYCRR Part 212.

Building(s): MAIN

Item 30.8(From Mod 0):

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

Emission Unit: P-00010

Emission Unit Description:

Emission Unit P-00010 includes a natural gas-fired boiler used for space heat. The maximum heat input capacity is 10.4 mmBtu/hr.

Building(s): MAIN

Item 30.9(From Mod 0):

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

Emission Unit: P-00012

Emission Unit Description:

Emission Unit P-00012 is a zinc phosphate metal treatment process. The emissions from these sources are regulated by 6NYCRR Part 212.

Building(s): MAIN

**Condition 31: Renewal deadlines for state facility permits
Effective between the dates of 01/24/2018 and 01/23/2028**

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

Item 31.1:

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 32: Compliance Demonstration
Effective between the dates of 01/24/2018 and 01/23/2028**

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

Item 32.1:

The Compliance Demonstration activity will be performed for the Facility.

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Item 32.2:

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 1/30/2018.

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

Condition 8: Air pollution prohibited
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable State Requirement:6 NYCRR 211.1

Item 8.1:

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.

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

Condition 34: Emission Point Definition By Emission Unit
Effective between the dates of 01/24/2018 and 01/23/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 34.1(From Mod 1):

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

Emission Unit: P-00001

Emission Point: 00326

Height (ft.): 36

Diameter (in.): 26

NYTMN (km.): 4714.599

NYTME (km.): 218.419

Building: MAIN

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Emission Point: 00333
Height (ft.): 36 Diameter (in.): 26
NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Emission Point: 00335
Height (ft.): 36 Diameter (in.): 26
NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Item 34.2(From Mod 1):

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

Emission Unit: P-00004

Emission Point: 00156
Height (ft.): 26 Length (in.): 30 Width (in.): 28
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00173
Height (ft.): 26 Length (in.): 28 Width (in.): 25
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Item 34.3(From Mod 1):

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

Emission Unit: P-00005

Emission Point: 00510
Height (ft.): 31 Diameter (in.): 31
NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Emission Point: 00514
Height (ft.): 37 Diameter (in.): 28
NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Item 34.4(From Mod 1):

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

Emission Unit: P-00009

Emission Point: 00633
Height (ft.): 46 Diameter (in.): 24
NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Item 34.5(From Mod 0):

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

Emission Unit: P-00002

Emission Point: 00252
Height (ft.): 49 Diameter (in.): 23
NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

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Emission Point: 00254	Height (ft.): 46	Diameter (in.): 23	
NYTMN (km.): 4714.599		NYTME (km.): 218.419	Building: MAIN
Emission Point: 00392	Height (ft.): 31	Diameter (in.): 36	
NYTMN (km.): 4714.599		NYTME (km.): 218.419	Building: MAIN
Emission Point: 00511	Height (ft.): 49	Diameter (in.): 17	
NYTMN (km.): 4714.599		NYTME (km.): 218.419	Building: MAIN
Emission Point: 00515	Height (ft.): 46	Diameter (in.): 15	
NYTMN (km.): 4714.599		NYTME (km.): 218.419	Building: MAIN
Emission Point: 00516	Height (ft.): 46	Diameter (in.): 18	
NYTMN (km.): 4714.52		NYTME (km.): 218.329	Building: MAIN
Emission Point: 00519	Height (ft.): 30	Diameter (in.): 30	
NYTMN (km.): 4714.599		NYTME (km.): 218.419	Building: MAIN
Emission Point: 00520	Height (ft.): 30	Diameter (in.): 18	
NYTMN (km.): 4714.599		NYTME (km.): 218.419	Building: MAIN
Emission Point: 00522	Height (ft.): 46	Diameter (in.): 30	
NYTMN (km.): 4714.52		NYTME (km.): 218.329	Building: MAIN
Emission Point: 00523	Height (ft.): 46	Diameter (in.): 18	
NYTMN (km.): 4714.52		NYTME (km.): 218.329	Building: MAIN
Emission Point: 00524	Height (ft.): 46	Diameter (in.): 14	
NYTMN (km.): 4714.599		NYTME (km.): 218.419	Building: MAIN
Emission Point: 00525	Height (ft.): 46	Diameter (in.): 12	
NYTMN (km.): 4714.599		NYTME (km.): 218.419	Building: MAIN
Emission Point: 00526	Height (ft.): 46	Diameter (in.): 22	
NYTMN (km.): 4714.52		NYTME (km.): 218.329	Building: MAIN
Emission Point: 00551	Height (ft.): 49	Diameter (in.): 17	
NYTMN (km.): 4714.52		NYTME (km.): 218.329	Building: MAIN

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Emission Point: 00552
 Height (ft.): 49 Diameter (in.): 17
 NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00554
 Height (ft.): 49 Diameter (in.): 17
 NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00555
 Height (ft.): 49 Diameter (in.): 17
 NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00556
 Height (ft.): 49 Diameter (in.): 17
 NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00630
 Height (ft.): 49 Diameter (in.): 17
 NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00631
 Height (ft.): 49 Diameter (in.): 17
 NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00632
 Height (ft.): 49 Diameter (in.): 17
 NYTMN (km.): 4714.52 NYTME (km.): 218.329 Building: MAIN

Emission Point: 00637
 Height (ft.): 49 Diameter (in.): 16
 NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Item 34.6(From Mod 0):

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

Emission Unit: P-00003

Emission Point: 00019
 Height (ft.): 29 Diameter (in.): 24
 NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Emission Point: 00512
 Height (ft.): 30 Length (in.): 11 Width (in.): 6
 NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Item 34.7(From Mod 0):

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

Emission Unit: P-00006

Emission Point: 00527

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Height (ft.): 37 Diameter (in.): 12
NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Item 34.8(From Mod 0):

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

Emission Unit: P-00010

Emission Point: 00639
Height (ft.): 30 Diameter (in.): 24
NYTMN (km.): 4714.599 NYTME (km.): 218.419 Building: MAIN

Item 34.9(From Mod 0):

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

Emission Unit: P-00012

Emission Point: 00314
Height (ft.): 39 Diameter (in.): 36
NYTMN (km.): 4714.599 NYTME (km.): 218.419

Condition 35: Process Definition By Emission Unit

Effective between the dates of 01/24/2018 and 01/23/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 35.1(From Mod 1):

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

Emission Unit: P-00001
Process: SVP Source Classification Code: 4-02-003-01
Process Description:

Process SVP includes a conveyORIZED varnish dip and oven dry process for miscellaneous metal parts. The surface coating operation is identified as a Class B Miscellaneous Metal Parts coating process in 6 NYCRR Part 228-1.4(b). The coating category is listed in Table B4 as Electric-Insulating Varnish requiring an as-applied VOC content limit of 3.5 pounds per gallon.

Emission Reduction Credits (ERCs) have been issued for this process. As part of the establishment of the ERCs, Prestolite accepted an annual VOC emissions cap for process SVP. In accordance with the applicable emissions cap, total VOC emissions from this process cannot exceed 28,800 pounds per year.

This process is vented through three exhaust stacks that combine and emit to the outdoor atmosphere through a single emission point, identified as 00333.

Emission Source/Control: I0326 - Process

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Emission Source/Control: I0333 - Process

Emission Source/Control: I0335 - Process

Item 35.2(From Mod 1):

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

Emission Unit: P-00002

Process: RVP

Source Classification Code: 4-02-003-01

Process Description:

Process RVP includes a roll dip varnish surface coating operation identified as a Class B Miscellaneous Metal Parts coating process in 6 NYCRR Part 228-1.4(b). The coating category is listed in Table B4 as Electric-Insulating Varnish requiring a VOC content limit of 3.5 pounds per gallon.

Emission Source/Control: K0516 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0526 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0555 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0630 - Control
Control Type: PAPER FILTER

Emission Source/Control: I0252 - Process

Emission Source/Control: I0516 - Process

Emission Source/Control: I0524 - Process

Emission Source/Control: I0525 - Process

Emission Source/Control: I0526 - Process

Emission Source/Control: I0555 - Process

Emission Source/Control: I0630 - Process

Emission Source/Control: I254A - Process

Emission Source/Control: I254B - Process

Emission Source/Control: I637A - Process

Emission Source/Control: I637B - Process

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Item 35.3(From Mod 1):

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

Emission Unit: P-00002

Process: SCC

Source Classification Code: 4-02-001-01

Process Description:

Process SCC includes paint spray booths used to apply surface coatings to miscellaneous metal parts. The coating category for this process is identified as an Extreme Performance (Air Dried) category. In accordance with Table B4 of 6 NYCRR Subpart 228-1.4(b)(4), the coating VOC limit for these coatings is 3.5 pounds of VOC per gallon of coating (minus water and excluded compounds) at application. If the coatings are oven dried, then the as-applied coating VOC limit is 3.0 pounds VOC per gallon.

These paint booths utilize particulate filters to control emissions of solids particulates that are regulated under 6 NYCRR Part 212-2.4(b).

Emission Source/Control: K0392 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0511 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0515 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0519 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0520 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0522 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0523 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0551 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0552 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0554 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0556 - Control

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Control Type: PAPER FILTER

Emission Source/Control: K0631 - Control
Control Type: PAPER FILTER

Emission Source/Control: K0632 - Control
Control Type: PAPER FILTER

Emission Source/Control: I0392 - Process

Emission Source/Control: I0511 - Process

Emission Source/Control: I0515 - Process

Emission Source/Control: I0519 - Process

Emission Source/Control: I0520 - Process

Emission Source/Control: I0522 - Process

Emission Source/Control: I0523 - Process

Emission Source/Control: I0551 - Process

Emission Source/Control: I0552 - Process

Emission Source/Control: I0554 - Process

Emission Source/Control: I0556 - Process

Emission Source/Control: I0631 - Process

Emission Source/Control: I0632 - Process

Item 35.4(From Mod 1):

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

Emission Unit: P-00009

Process: SMT

Source Classification Code: 2-04-004-02

Process Description:

Process SMT includes Starter Motor and Alternator Test Stands (SMT). The starter motors and alternators are manufactured at Prestolite and are designed for use on mobile truck diesel engines. To satisfy customer and business development demands, the facility has the capability to test the starter motors and alternators by installing the equipment on mobile truck diesel engines.

For the starter motor testing, a starter motor or motors are connected to the appropriately sized diesel engine. The test cycle consists of starting the engine, operating



the engine for five seconds to evaluate the starter motor performance, and then shutting the engine down. The shutdown procedure takes approximately 25 seconds. Each starter motor completes two cycles per minute continuously until the starter motor completes the required number of starting cycles.

For the alternator testing, an alternator is connected to the appropriately sized diesel engine. The diesel engine is started and run at varying revolutions per minute for 3000 hours.

The emissions from the starter motor and Alternator test stands are uncontrolled. Exhaust from the diesel engines are collected and emitted through one common stack.

Any truck engine that remains at the facility for more than 12 consecutive months is considered a stationary engine subject to the testing and certification requirements of 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (RICE) or 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, where applicable.

Any truck engine that remains at the facility for less than 12 consecutive months is not a stationary source and not subject to 40 CFR 60 Subpart IIII or 40 CFR 63 Subpart ZZZZ.

The starter motor and alternator test stands are identified as emission source 00SMT. The emission point is identified as 00633.

Emission Source/Control: 00SMT - Combustion

Item 35.5(From Mod 0):

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

Emission Unit: P-00003

Process: SOL

Source Classification Code: 3-13-035-01

Process Description:

Process SOL includes automated soldering operations for electrical components. The emissions from this process are uncontrolled. The contaminants emitted from the solder bar, flux and paste were evaluated in accordance with 6 NYCRR Part 212-2.1(b). The analysis resulted in the facility accepting a limit of 2500 pounds per year solder bar and 480 gallons per year solder flux.

This process is uncontrolled and is regulated under 6

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NYCRR Part 212. In accordance with 6 NYCRR 212-2.4(b)(1), particulate emissions are limited to a grain-loading standard of 0.05 gr/dscf.

Emission Source/Control: REFLO - Process

Emission Source/Control: WAVE1 - Process

Item 35.6(From Mod 0):

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

Emission Unit: P-00006

Process: HCU

Source Classification Code: 4-02-025-02

Process Description:

Process HCU is a metal heat cleaning operation to remove paint, grease, oils, varnish, epoxy, rubber and other combustible materials from metal parts. The parts are heated to 750F in an oxygen deficient atmosphere to enhance hydrocarbon decomposition. These emissions are controlled by an afterburner, which is part of the oven design. The afterburner creates minimum temperatures of 1,400F. The afterburner normally operates at 1,500F with a minimum 0.5 second dwell time. The manufacturer estimates the control efficiency for volatile components within the burn off oven exhaust to be 99%.

This process is regulated under 6 NYCRR Part 212. The contaminants emitted from the heat cleaning oven were evaluated in accordance with 6 NYCRR Part 212-2.1(b). The analysis demonstrated the afterburner satisfies the control requirement of Table 4. In accordance with 6 NYCRR 212-2.4(b)(1), particulate emissions are limited to a grain-loading standard of 0.05 gr/dscf.

Emission Source/Control: KEATC - Control

Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: HEATC - Process

Item 35.7(From Mod 0):

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

Emission Unit: P-00010

Process: COM

Source Classification Code: 1-02-006-02

Process Description:

Process COM includes a 10.4 mmBtu/hr natural gas-fired boiler used for space heat.

Emission Source/Control: C0639 - Combustion

Design Capacity: 10.4 million Btu per hour

Item 35.8(From Mod 0):

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

Emission Unit: P-00012

Process: PHO

Process Description:

Process PHO includes a zinc phosphate line used to pre-treat material for subsequent painting. The process line includes eight (8) tanks. One tank contains a zinc phosphate solution. The remaining tanks are used as rinse tanks, acid tanks, degreaser and rust inhibitor. The contaminants emitted from the process tanks were evaluated in accordance with 6 NYCRR Part 212-2.1(b). The nickel emissions were less than the 10 pound per year maximum emission limit. The phosphoric acid emissions were less than the SGC and AGC.

The zinc phosphate tank solution is less than the regulatory threshold of 0.1 weight percent nickel and is not subject to 40 CFR 63 Subpart WWWW requirements.

Emission Source/Control: PHOS1 - Process