



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 1-2822-01225/00001
Effective Date: 08/19/2013 Expiration Date: 08/18/2018

Permit Issued To: TRIUMPH STRUCTURES - LONG ISLAND LLC
717 MAIN ST
WESTBURY, NY 11590

Contact: LEONARD GROSS
TRIUMPH STRUCTURES LONG ISLAND LLC
717 MAIN ST
WESTBURY, NY 11590
(516) 997-5757

Facility: AIRCRAFT PROTECTIVE SYSTEMS A DIV OF TRIUMPH STRUCTURES
LI LLC
88 URBAN AVE
WESTBURY, NY 11590

Contact: MARGARET A KLIEBER-SCHRECK
AIRCRAFT PROTECTIVE SYSTEMS
88 URBAN AVE
WESTBURY, NY 11590
(516) 997-5757

Description:
Aircraft Protective Systems is involved in chromium and sulfuric acid anodizing and spray coating of aerospace aluminum and steel parts. The 2 Emission Units of the facility consist of coating in spray booths and drying of coated parts in an oven, and cleaning and anodizing of aluminum and steel parts in chromium and sulfuric acid baths. The spray coating and drying unit consists of 5 Emission Points which are associated with 3 spray booths and two drying ovens. The cleaning and anodizing consists of 2 Emission Points which are associated with emissions from chromic and sulfuric acid anodizing tanks.

New York State Department of Environmental Conservation
Facility DEC ID: 1282201225



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: SUSAN ACKERMAN
 NYSDEC - SUNY @ STONY BROOK
 50 CIRCLE RD
 STONY BROOK, NY 11790-3409

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 1 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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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



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 1 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 1 Headquarters
Division of Environmental Permits
Stony Brook University
50 Circle Road
Stony Brook, NY 11790-3409
(631) 444-0365

New York State Department of Environmental Conservation

Permit ID: 1-2822-01225/00001

Facility DEC ID: 1282201225



Permit Under the Environmental Conservation Law (ECL)

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

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Permit Issued To: TRIUMPH STRUCTURES - LONG ISLAND LLC
717 MAIN ST
WESTBURY, NY 11590

Facility: AIRCRAFT PROTECTIVE SYSTEMS A DIV OF TRIUMPH
STRUCTURES LI LLC
88 URBAN AVE
WESTBURY, NY 11590

Authorized Activity By Standard Industrial Classification Code:
3471 - ELECTROPLATING, POLISHING, ANODIZING, AND COLORING
3479 - METAL COATING AND ALLIED SERVICES, NEC

Permit Effective Date: 08/19/2013

Permit Expiration Date: 08/18/2018



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 3 6 NYCRR 211.1: Air pollution prohibited
- 4 40CFR 63.342(d)(3), Subpart N: Compliance Demonstration

Emission Unit Level

EU=1-PAINT,Proc=SPO

- 5 6 NYCRR 212.4 (c): Compliance Demonstration
- 6 6 NYCRR 212.4 (c): Compliance Demonstration
- 7 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 8 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal

EU=2-ANODZ,Proc=ANO,ES=CANOD

- 9 40CFR 63.340(b), Subpart N: Part 63 General Provisions requirements
- 10 40CFR 63.346(a), Subpart N: Compliance Demonstration

EU=2-ANODZ,EP=00005,Proc=ANO,ES=SANOD

- 11 6 NYCRR 212.9 (b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

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

Emission Unit Level

- 18 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 19 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: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

Item K: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item L: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions



Effective between the dates of 08/19/2013 and 08/18/2018

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1.1:

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

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

CAS No: 0NY998-00-0

PTE: 50,000 pounds per year

Name: VOC

Condition 2: Capping Monitoring Condition

Effective between the dates of 08/19/2013 and 08/18/2018

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2.1:

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

6 NYCRR Subpart 231-1

Item 2.2:

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

Item 2.3:

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

Item 2.4:

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

Item 2.5:

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

Item 2.6:

The Compliance Demonstration activity will be performed for the Facility.

New York State Department of Environmental Conservation

Permit ID: 1-2822-01225/00001

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

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:
VOC emissions from the facility are limited to 22.5 tons
per year.

Parameter Monitored: VOC
Upper Permit Limit: 50000 pounds per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 12 calendar month(s).

Condition 3: Air pollution prohibited
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable Federal Requirement:6 NYCRR 211.1

Item 3.1:

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

Condition 4: Compliance Demonstration
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable Federal Requirement:40CFR 63.342(d)(3), Subpart N

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:



An owner or operator using a chemical fume suppressant containing a wetting agent must not allow the surface tension of the electroplating or anodizing bath contained within the affected tank to exceed 40 dynes/cm as measured by a stalagmometer at any time during tank operation.

Parameter Monitored: SURFACE TENSION
Upper Permit Limit: 40 dynes per centimeter
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 6 calendar month(s).

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

Condition 5: Compliance Demonstration
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT
Process: SPO

Item 5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

New York State Department of Environmental Conservation

Permit ID: 1-2822-01225/00001

Facility DEC ID: 1282201225



Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable 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: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 12 calendar month(s).

Condition 6: Compliance Demonstration
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT
Process: SPO

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

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:



Operators of all paint spray booths must periodically monitor the booths and the accompanying particulate control device(s) by completing the following tasks on a weekly basis:

- Inspect the spray booth emission point for evidence of paint fallout and for presence of visible emissions. Presence of visible emissions indicates that the emission sources may not be operating properly and may need servicing.
- Inspect the spray booth's particulate control device for evidence that maintenance or replacement is needed.
- Record in an inspection log, which shall be made available for Department review upon request, the following information: Date, time, name of staff person performing inspection, and inspection results for each inspection; and, whenever a problem is discovered, a description of the problem, cause and corrective action taken.

Regardless of when a problem is noted, i.e., at a time other than during the weekly inspection, it must be immediately remedied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 7: Compliance Demonstration
Effective between the dates of 08/19/2013 and 08/18/2018

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

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Process: SPO

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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



will be determined by conducting a Method 9 opacity evaluation at a minimum frequency of once per year, while the source is in normal operating mode.

In addition to the above opacity evaluation, the permittee will conduct daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

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

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

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

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

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



Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
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 8: Surface Coating - Handling, storage and disposal
Effective between the dates of 08/19/2013 and 08/18/2018

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

Item 8.1:

This Condition applies to Emission Unit: 1-PAINT
Process: SPO

Item 8.2:

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

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



Condition 9: Part 63 General Provisions requirements
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable Federal Requirement:40CFR 63.340(b), Subpart N

Item 9.1:

This Condition applies to Emission Unit: 2-ANODZ

Process: ANO

Emission

Source: CANOD

Item 9.2:

Owners or operators of affected sources subject to 40CFR63 Subpart N must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Table 1 of Subpart N. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

Condition 10: Compliance Demonstration
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable Federal Requirement:40CFR 63.346(a), Subpart N

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ANODZ

Process: ANO

Emission Source: CANOD

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected source subject to 40CFR 63 Subpart N shall fulfill all recordkeeping requirements outlined in section 63.346 and in the General Provisions to 40CFR 63 (40CFR63 Subpart A).

The records specific for Subpart N are listed as items numbered 1 through 16 under section 63.346(b).

Subpart A requirements are specified in Table 1 to Subpart N. They are listed as follows:



63.10(a)(3): If any State requires a report that contains all the information required in a report listed in Subpart A, an owner or operator may send the Administrator a copy of the report sent to the State to satisfy the requirements of Subpart A for that report.

63.10(a)(4)(ii): After a State has been delegated the authority to implement and enforce recordkeeping and reporting requirements established under this part, the owner or operator of an affected source in such State subject to such requirements shall submit reports to the delegated State authority (which may be the same as the permitting authority). In addition, if the delegated (permitting) authority is the State, the owner or operator shall send a copy of each report submitted to the State to the appropriate Regional Office of the EPA, as specified in paragraph (a)(4)(i) of section 63.10. The Regional Office may waive this requirement for any reports at its discretion.

63.10(a)(5): If an owner or operator of an affected source in a State with delegated authority is required to submit periodic reports under Part 63 to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such source under Part 63, the owner or operator may change the dates by which periodic reports under Part 63 shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State. For each relevant standard established pursuant to section 112 of the Act, the allowance in the previous sentence applies in each State beginning 1 year after the affected source's compliance date for that standard. Procedures governing the implementation of this provision are specified in §63.9(i).

63.10(a)(6): If an owner or operator supervises one or more stationary sources affected by more than one standard established pursuant to section 112 of the Act, he/she may arrange by mutual agreement between the owner or operator and the Administrator (or the State permitting authority) a common schedule on which periodic reports required for each source shall be submitted throughout the year. The allowance in the previous sentence applies in each State beginning 1 year after the latest compliance date for any relevant standard established pursuant to section 112 of the Act for any such affected source(s). Procedures governing the implementation of this provision are specified in §63.9(i).



63.10(a)(7): If an owner or operator supervises one or more stationary sources affected by standards established pursuant to section 112 of the Act (as amended November 15, 1990) and standards set under part 60, part 61, or both such parts of this chapter, he/she may arrange by mutual agreement between the owner or operator and the Administrator (or the State permitting authority) a common schedule on which periodic reports required by each relevant (i.e., applicable) standard shall be submitted throughout the year. The allowance in the previous sentence applies in each State beginning 1 year after the stationary source is required to be in compliance with the relevant section 112 standard, or 1 year after the stationary source is required to be in compliance with the applicable part 60 or part 61 standard, whichever is latest. Procedures governing the implementation of this provision are specified in §63.9(i).

63.10(b): The owner or operator of an affected source subject to the provisions of Part 63 shall maintain files of all information (including all reports and notifications) required by Part 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable Federal Requirement: 6 NYCRR 212.9 (b)

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-ANODZ	Emission Point: 00005
Process: ANO	Emission Source: SANOD

Regulated Contaminant(s):	
CAS No: 007664-93-9	SULFURIC ACID

Item 11.2:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 1-2822-01225/00001

Facility DEC ID: 1282201225



Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Sulfuric acid is a toxic compound and its emission rate potential for this emission point (before control) was estimated to be 0.2 pounds per hour. The polypropylene balls floating on the surface of the tank are estimated to control about 50% of these emissions. With this control the emissions are below the ambient guideline concentration listed in guidance document DAR-1 and it is not necessary to install the best available control technology to control the emissions.

If inspections offer reasons to doubt that the sulfuric acid emissions exceed the allowable concentration, the Department may request a performance test pursuant of 6NYCRR Part 202-1. The test must show that the actual emission rate is less than 0.1 pounds per hour.

Parameter Monitored: SULFURIC ACID

Upper Permit Limit: 0.10 pounds per hour

Reference Test Method: EPA Method 8

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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



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

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

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 12: Contaminant List
Effective between the dates of 08/19/2013 and 08/18/2018



under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

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

Condition 14: Emission Unit Definition
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 14.1:

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

Emission Unit: 1-PAINT

Emission Unit Description:

The Emission Unit consists of three spray booths where the metal parts are coated with compliant paints, and two curing ovens where the parts are dried. The emissions from spray booths and curing oven are vented through five emission points. Emissions from the paint storage room are exempted because the paints stored at this location are kept in closed containers.

Building(s): HDQ

Item 14.2:

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

Emission Unit: 2-ANODZ

Emission Unit Description:

The Emission Unit consists of alkaline cleaning, etching, deoxidizing, and anodizing processes. The emissions from chromic anodizing tank are controlled by a chemical fume suppressant prior of being vented through the Emission Point 4. Emissions from the sulfuric acid bath are vented through the Emission Point 5.

Building(s): HDQ

Condition 15: Renewal deadlines for state facility permits
Effective between the dates of 08/19/2013 and 08/18/2018

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

Item 15.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

New York State Department of Environmental Conservation

Permit ID: 1-2822-01225/00001

Facility DEC ID: 1282201225



Condition 16: Compliance Demonstration
Effective between the dates of 08/19/2013 and 08/18/2018

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

Item 16.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 16.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 1
SUNY at Stony Brook
Building 40
Stony Brook, NY 11790-2356

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 12 calendar month(s).

Condition 17: Visible Emissions Limited
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable State Requirement:6 NYCRR 211.2

Item 17.1:
Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**** Emission Unit Level ****

Condition 18: Emission Point Definition By Emission Unit
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1:
The following emission points are included in this permit for the cited Emission Unit:

New York State Department of Environmental Conservation

Permit ID: 1-2822-01225/00001

Facility DEC ID: 1282201225



Emission Unit: 1-PAINT

Emission Point: 00001
Height (ft.): 22 Diameter (in.): 24
NYTMN (km.): 4514.1 NYTME (km.): 621. Building: HDQ

Emission Point: 00002
Height (ft.): 22 Diameter (in.): 24
NYTMN (km.): 4514.1 NYTME (km.): 621. Building: HDQ

Emission Point: 00003
Height (ft.): 22 Diameter (in.): 12
NYTMN (km.): 4514.1 NYTME (km.): 621. Building: HDQ

Emission Point: 00006
Height (ft.): 22 Diameter (in.): 24
NYTMN (km.): 4514.1 NYTME (km.): 621. Building: HDQ

Emission Point: 00007
Height (ft.): 22 Diameter (in.): 12
NYTMN (km.): 4514.1 NYTME (km.): 621. Building: HDQ

Item 18.2:

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

Emission Unit: 2-ANODZ

Emission Point: 00004
Height (ft.): 19 Diameter (in.): 15
NYTMN (km.): 4514.1 NYTME (km.): 621. Building: HDQ

Emission Point: 00005
Height (ft.): 18 Diameter (in.): 12
NYTMN (km.): 4514.1 NYTME (km.): 621. Building: HDQ

Condition 19: Process Definition By Emission Unit
Effective between the dates of 08/19/2013 and 08/18/2018

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1:

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

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

Process Description:
Compliant coatings are applied to metal parts in three
spray booths and the parts are dried in two curing ovens.
The paints are stored in closed containers.

Emission Source/Control: PSB01 - Control
Control Type: MAT OR PANEL FILTER

New York State Department of Environmental Conservation

Permit ID: 1-2822-01225/00001

Facility DEC ID: 1282201225



Emission Source/Control: PSB02 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSB03 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSOV1 - Process

Emission Source/Control: PSOV2 - Process

Item 19.2:

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

Emission Unit: 2-ANODZ

Process: ANO

Source Classification Code: 3-09-011-03

Process Description:

The metal parts are cleaned in an alkaline solution at 150 F. After rinsing at ambient temperature, the parts are etched at 140 F, dioxidized at 70 F, and rinsed. After inspection the parts are either anodized or chemically filmed. The anodized parts are resealed and the filmed parts are rinsed. Some parts are subsequently masked, primed, and/or topcoated. All parts are then inspected, packed, and shipped to customers. The emissions from chromic and sulfuric acid anodizing baths are vented into the atmosphere through emission points 4 and 5.

Emission Source/Control: CANOD - Control
Control Type: CHEMICAL FUME SUPPRESSANT - WETTING
AGENT FOR REDUCING SURFACE TENSION

Emission Source/Control: SANOD - Process

