

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3352-00334/00001

Effective Date: 08/06/2020 Expiration Date: 08/05/2030

Permit Issued To:ADVANCED COATING TECHNOLOGIES LLC

60 TURNER RD STE A MIDDLETOWN, NY 10941

Facility: ADVANCED COATING TECHNOLOGIES

60 TURNER RD STE A MIDDLETOWN, NY 10941

Contact: CHRIS MILLEA

ADVANCED COATING TECHNOLOGIES

60 TURNER DR

MIDDLETOWN, NY 10941

Description:

The facility is primarily used for the application of engineered coatings to industrial and military specifications. The operations include but are not limited to coating, cleaning, cutting, and heat treatment.

Air emission sources at the facility include plasma coating equipment, evaporators, a central vacuum system, and cathodic arc machines.

The facility is subject to the requirements of 6NYCRR Part 212. Emissions of chromium compounds, manganese, and nickel compounds are restricted to the annual limits specified in Table 2 of Part 212.

Division of Air Resources



Facility DEC ID: 3335200334

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:	REBECCA S CRIST				
	21 S PUTT CORNERS RD				
	NEW PALTZ, NY 12561				
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.



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DEC GENERAL CONDITIONS

General Provisions

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- 4 2 Relationship of this Permit to Other Department Orders and Determinations
- 4 3 Applications for permit renewals, modifications and transfers
- 5 4 Permit modifications, suspensions or revocations by the Department Facility Level
- 5 Submission of application for permit modification or renewal-REGION 3 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.

Item3.2:

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

Division of Air Resources



Facility DEC ID: 3335200334

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 3

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 3 Headquarters Division of Environmental Permits 21 South Putt Corners Road New Paltz, NY 12561-1696 (845) 256-3054



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:ADVANCED COATING TECHNOLOGIES LLC 60 TURNER RD STE A MIDDLETOWN, NY 10941

Facility: ADVANCED COATING TECHNOLOGIES

60 TURNER RD STE A MIDDLETOWN, NY 10941

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

Permit Effective Date: 08/06/2020 Permit Expiration Date: 08/05/2030



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FEDERALLY ENFORCEABLE CONDITIONS

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**** 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



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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: Maintenance of Equipment

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable Federal Requirement: 6 NYCRR 200.7

Item 1.1:

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.

Condition 2: Required Emissions Tests

Effective between the dates of 08/06/2020 and 08/05/2030

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 3: Compliance Demonstration

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable Federal Requirement: 6 NYCRR 200.7

Item 3.1:

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

Emission Unit: U-00001 Emission Point: 00005

Emission Unit: U-00001 Emission Point: 00006

Emission Unit: U-00001 Emission Point: 00009

Air Pollution Control Permit Conditions

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Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The dust collector and HEPA filter must achieve a combined reduction in particulate emissions of at least 99.99 percent for each of the emission points listed in this permit condition. To assure this reduction, filters must be maintained in good condition. A record shall be kept of when filters are replaced.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable Federal Requirement: 6 NYCRR 200.7

Item 4.1:

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

Emission Unit: U-00001 Emission Point: 00001

Emission Unit: U-00001 Emission Point: 00002

Emission Unit: U-00001 Emission Point: 00003

Emission Unit: U-00001 Emission Point: 00004

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

A combined reduction in particulate emissions of at least 99.99 percent must be achieved by the filters and oil bath for each of the emission points listed in this permit condition. To assure this reduction, filters must be maintained in good condition. A record shall be kept of when the filters are replaced.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Visible Emissions Limited

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable Federal Requirement: 6 NYCRR 211.2

Item 5.1:

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 6: Compliance Demonstration

Effective between the dates of 08/06/2020 and 08/05/2030

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

Item 6.1:

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

Emission Unit: U-00001 Emission Point: 00001

Emission Unit: U-00001 Emission Point: 00002

Emission Unit: U-00001 Emission Point: 00003

Emission Unit: U-00001 Emission Point: 00004

Emission Unit: U-00001 Emission Point: 00005

Emission Unit: U-00001 Emission Point: 00006

Emission Unit: U-00001 Emission Point: 00009

Emission Unit: U-00003 Emission Point: 00010

Emission Unit: U-00004 Emission Point: 00011

Item 6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water. The Department may require the performance of a Method 9 visible emission observation at any time during facility operation.



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Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 7: Compliance Demonstration

Effective between the dates of 08/06/2020 and 08/05/2030

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

Item 7.1:

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

Emission Unit: U-00001 Emission Point: 00005

Emission Unit: U-00001 Emission Point: 00006

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility owner or operator shall not cause or allow particulate emissions which exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Emission testing will be conducted by the facility owner if directed by the Department.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**** Emission Unit Level ****

Condition 8: Compliance Demonstration

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable Federal Requirement: 40CFR 63, Subpart WWWWWW

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Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

> For all thermal processes, a capture system must be operated which collects particulate emissions from the thermal spraying process, and transports the emissions to a filtering device. Emission capture and control devices must be operated according to manufacturer's specifications and operating instructions. These instructions shall be kept at the facility at all times in a location that is easily accessible to facility personnel.

Compliance shall be documented in an annual compliance report for each calendar year. The annual report must include a statement that the control devices have been operated and maintained according to manufacturer's specifications and instructions. The annual report must be submitted only if deviations from this permit condition have occurred during the year. Then such report shall include an explanation of the deviation and the corrective action taken, and the report must be postmarked or delivered to the delegated authority no later than January 31 of the year following the reporting period.

All reports and records must be kept at the facility for a minimum of 5 years, and must be made available upon request by regulatory personnel.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 9: Compliance Demonstration

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable Federal Requirement: 6 NYCRR 200.7

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00003 Emission Point: 00010

Regulated Contaminant(s):

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

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Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The dust collector must achieve a reduction in particulate emissions of at least 99 percent. To assure this reduction, dust collector filters must be maintained in good condition. A record shall be kept of when filters are replaced.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective between the dates of 08/06/2020 and 08/05/2030

Applicable Federal Requirement: 6 NYCRR 200.7

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004 Emission Point: 00011

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The pump filters must achieve a reduction in particulate emissions of at least 95 percent. To assure this reduction, the filters must be maintained in good condition. A record shall be kept of when filters are replaced.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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



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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 11: Contaminant List

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable State Requirement: ECL 19-0301

Item 11.1:

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

CAS No: 007439-96-5 Name: MANGANESE

CAS No: 007440-02-0

Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 007440-47-3 Name: CHROMIUM

CAS No: 012012-35-0

Name: CHROMIUM CARBIDE



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

Condition 12: Malfunctions and start-up/shutdown activities

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable State Requirement: 6 NYCRR 201-1.4

Item 12.1:

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.
- (c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.
- (d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 13: Emission Unit Definition
Effective between the dates of 08/06/2020 and 08/05/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 13.1:

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



Permit ID: 3-3352-00334/00001 **Facility DEC ID: 3335200334**

Emission Unit: U-00001 **Emission Unit Description:**

Plasma Coating Equipment

Building(s): MAIN

Item 13.2:

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

Emission Unit: U-00002 **Emission Unit Description:** Evaporator

Building(s): MAIN

Item 13.3:

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

Emission Unit: U-00003 **Emission Unit Description:** Central Vacuum

Building(s): MAIN

Item 13.4:

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

Emission Unit: U-00004 **Emission Unit Description:** Cathodic Arc Machines

Building(s): MAIN

Condition 14: Renewal deadlines for state facility permits

Effective between the dates of 08/06/2020 and 08/05/2030

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

Item 14.1:

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

Condition 15: CLCPA Applicability

Effective between the dates of 08/06/2020 and 08/05/2030

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

Item 15.1:

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.



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Condition 16: Compliance Demonstration

Effective between the dates of 08/06/2020 and 08/05/2030

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 3 21 South Putt Corners Rd. New Paltz, NY 12561

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 17: Air pollution prohibited

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable State Requirement: 6 NYCRR 211.1

Item 17.1:

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 18: Compliance Demonstration

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable State Requirement: 6 NYCRR 212-2.2

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007440-02-0 NICKEL METAL AND INSOLUBLE

COMPOUNDS

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Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall limit actual emissions of nickel and nickel compounds from all process operations to a total of 10 pounds per year. A record shall be kept of these emissions.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Demonstration
Effective between the dates of 08/06/2020 and 08/05/2030

Applicable State Requirement: 6 NYCRR 212-2.2

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007439-96-5 MANGANESE

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility owner or operator shall limit actual emissions of manganese from all process operations at the facility to 10 pounds per year. A record shall be kept of manganese emissions.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Compliance Demonstration

Effective between the dates of 08/06/2020 and 08/05/2030

Applicable State Requirement: 6 NYCRR 212-2.2

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 012012-35-0 CHROMIUM CARBIDE

CAS No: 007440-47-3 CHROMIUM

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

The facility owner or operator shall limit actual emissions of chromium and chromium compounds, including trichromium dicarbide (chromium carbide), from all proces operations to a total of 250 pounds per year. A record shall be kept of these emissions.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**** Emission Unit Level ****

Condition 21: Emission Point Definition By Emission Unit Effective between the dates of 08/06/2020 and 08/05/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 21.1:

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

Emission Unit: U-00001

Emission Point: 00001

Height (ft.): 38 Diameter (in.): 4

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Emission Point: 00002

Height (ft.): 38 Diameter (in.): 4

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Emission Point: 00003

Height (ft.): 38 Diameter (in.): 4

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Emission Point: 00004

Height (ft.): 38 Diameter (in.): 4

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Emission Point: 00005

Height (ft.): 7 Length (in.): 48 Width (in.): 72

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Emission Point: 00006

Height (ft.): 7 Length (in.): 48 Width (in.): 72

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Emission Point: 00009

Height (ft.): 7 Length (in.): 48 Width (in.): 72

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Item 21.2:

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

Emission Unit: U-00002

Emission Point: 00007

Height (ft.): 38 Diameter (in.): 3

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Emission Point: 00008

Height (ft.): 10 Diameter (in.): 6

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Item 21.3:

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

Emission Unit: U-00003

Emission Point: 00010

Height (ft.): 10 Diameter (in.): 8

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Item 21.4:

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

Emission Unit: U-00004

Emission Point: 00011

Height (ft.): 38 Diameter (in.): 4

NYTMN (km.): 4590.565 NYTME (km.): 551.937 Building: MAIN

Condition 22: Process Definition By Emission Unit Effective between the dates of 08/06/2020 and 08/05/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 22.1:

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

Emission Unit: U-00001

Process: 001 Source Classification Code: 3-09-040-10

Process Description:

Emission points 1, 2, 3 and 4 correspond to four Low Pressure Plasma Spray (LPPS) Coaters. The LPPS coaters are used to apply various coatings to gas turbine engines, blades and vane airfoils in a pressure and temperature controlled environment. The vacuum chamber for each LPPS is connected to a dust collector that does not vent to the outside. The vacuum chamber is also connected to a vacuum pump, which vents to the outside through a single stack. Trace powder from the LPPS vacuum chamber is released into the vacuum pump where it is trapped in a Dollinger filter and the pump oil and filters.



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Emission Source/Control: 00102 - Control Control Type: FIBERGLASS FILTER

Emission Source/Control: 00103 - Control

Control Type: PAPER FILTER

Emission Source/Control: 00202 - Control Control Type: FIBERGLASS FILTER

Emission Source/Control: 00203 - Control

Control Type: PAPER FILTER

Emission Source/Control: 00302 - Control Control Type: FIBERGLASS FILTER

Emission Source/Control: 00303 - Control

Control Type: PAPER FILTER

Emission Source/Control: 00402 - Control Control Type: FIBERGLASS FILTER

Emission Source/Control: 00403 - Control

Control Type: PAPER FILTER

Emission Source/Control: 00101 - Process

Emission Source/Control: 00201 - Process

Emission Source/Control: 00301 - Process

Emission Source/Control: 00401 - Process

Item 22.2:

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

Emission Unit: U-00001

Process: 002 Source Classification Code: 3-09-040-20

Process Description:

Emission points 5, 6, and 9 correspond to three (3) Air Pressure Plasma Spray (APPS) Coaters. The APPS coaters are used to apply ceramic coatings to turbine vanes. Trace powder from the APPS is released into a dust collector and then a HEPA filter which exhausts to the outside.

Emission Source/Control: 00502 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00503 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 00602 - Control

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Control Type: FABRIC FILTER

Emission Source/Control: 00603 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 00902 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00903 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 00501 - Process

Emission Source/Control: 00601 - Process

Emission Source/Control: 00901 - Process

Item 22.3:

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

Emission Unit: U-00002

Process: 003 Source Classification Code: 4-90-001-99

Process Description:

Emission points 7 and 8 correspond to two electric

evaporators.

Emission Source/Control: 00701 - Process

Emission Source/Control: 00801 - Process

Item 22.4:

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

Emission Unit: U-00003

Process: 004 Source Classification Code: 3-09-001-98

Process Description:

Emission point 10 corresponds to a central vacuum, which is used to collect metallic and ceramic powder, coating grit, and general floor dust from the floor. The vacuum is operated on an as-needed basis, for an estimated eight

hours per day.

Emission Source/Control: 01002 - Control Control Type: DUST COLLECTOR

Emission Source/Control: 01001 - Process

Item 22.5:

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

Emission Unit: U-00004

Process: 005 Source Classification Code: 3-09-040-20

Process Description:

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Emission Point 11 corresponds to four cathodic arc machines, which are used to apply a metal coating to parts. Each cathodic arc machine is connected to a vacuum pump that has a standard pump filter.

Emission Source/Control: 01105 - Control Control Type: FIBERGLASS FILTER

Emission Source/Control: 01106 - Control Control Type: FIBERGLASS FILTER

Emission Source/Control: 01107 - Control Control Type: FIBERGLASS FILTER

Emission Source/Control: 01108 - Control Control Type: FIBERGLASS FILTER

Emission Source/Control: 01101 - Process

Emission Source/Control: 01102 - Process

Emission Source/Control: 01103 - Process

Emission Source/Control: 01104 - Process



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