

Facility DEC ID: 4013800001

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 4-0138-00001/00031
Effective Date:

Expiration Date:

Permit Issued To: HANNAY REELS INC
553 ST RTE 143
PO BOX 159
WESTERLO, NY 12193-0159

Contact: HANNAY REELS INC
553 ST RTE 143
PO BOX 159
WESTERLO, NY 12193-0159
(518) 797-3791

Facility: HANNAY REELS INC
553 ST RTE 143
WESTERLO, NY 12193

Description:

This permit action is a renewal of the existing air state facility permit incorporating a minor modification. Hannay Reels manufacturers metal reels, which are used by industry to dispense hose and cable. Due to the moderately corrosive environments these reels must withstand, each reel is spray painted to provide a protective coating. To minimize the amount of VOC emissions being generated from the spray painting and drying operations the facility uses High Volume Low Pressure (HVLP) spray nozzles and compliant coatings.

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: PATRICIA M GABRIEL
NYSDEC - REGION 4
1130 N WESTCOTT RD
SCHENECTADY, NY 12306-2014

Authorized Signature: _____
Date: ____ / ____ / ____

Facility DEC ID: 4013800001

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.

Facility DEC ID: 4013800001

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- | | | |
|---|---|---|
| 4 | 1 | Facility Inspection by the Department |
| 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 | 5 | Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS |
|---|---|--|

Facility DEC ID: 4013800001

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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3

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

Facility DEC ID: 4013800001

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

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 4 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 4 Headquarters
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014
(518) 357-2069

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

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553 ST RTE 143
PO BOX 159
WESTERLO, NY 12193-0159

Facility: HANNAY REELS INC
553 ST RTE 143
WESTERLO, NY 12193

Authorized Activity By Standard Industrial Classification Code:
3499 - FABRICATED METAL PRODUCTS, NEC
3569 - GEN INDUSTRIAL MACHINERY, NEC

Permit Effective Date:

Permit Expiration Date:

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

| | |
|----|--|
| 6 | 1 6 NYCRR 201-7.1: Facility Permissible Emissions |
| 7 | *2 6 NYCRR 201-7.1: Capping Monitoring Condition |
| 8 | *3 6 NYCRR 201-7.1: Capping Monitoring Condition |
| 9 | *4 6 NYCRR 201-7.1: Capping Monitoring Condition |
| 11 | 5 6 NYCRR 211.2: Visible Emissions Limited |
| 11 | 6 6 NYCRR 212-2.4 (a): Compliance Demonstration |
| 12 | 7 6 NYCRR 212-2.4 (a): Compliance Demonstration |
| 13 | 8 6 NYCRR 228-1.1 (a) (3): Once in always in |
| 13 | 9 6 NYCRR 228-1.4 (b) (4): Compliance Demonstration |
| 14 | 10 6 NYCRR 228-1.5 (e): Compliance Demonstration |
| 14 | 11 40CFR 63.11516(f), Subpart XXXXXX: Compliance Demonstration |
| 16 | 12 40CFR 63.11519, NESHAP Subpart XXXXXX: Compliance Demonstration |

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

| | |
|----|--|
| 19 | 13 ECL 19-0301: Contaminant List |
| 20 | 14 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities |
| 21 | 15 6 NYCRR Subpart 201-5: Emission Unit Definition |
| 21 | 16 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits |
| 21 | 17 6 NYCRR 201-5.3 (c): Compliance Demonstration |
| 22 | 18 6 NYCRR 211.1: Air pollution prohibited |

Emission Unit Level

| | |
|----|--|
| 22 | 19 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit |
| 24 | 20 6 NYCRR Subpart 201-5: Process Definition By Emission Unit |

NOTE: * preceding the condition number indicates capping.

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

FEDERALLY ENFORCEABLE CONDITIONS

Renewal 2/DRAFT

**** 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,

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

required to operate such device effectively.

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

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

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

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

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)

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

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 for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-7.1

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: 000067-56-1 Name: METHYL ALCOHOL | PTE: 19,000 pounds per year |
| CAS No: 000091-20-3 Name: NAPHTHALENE | PTE: 19,000 pounds per year |
| CAS No: 000098-82-8 Name: BENZENE, (1-METHYLETHYL) | PTE: 19,000 pounds per year |
| CAS No: 000100-41-4 Name: ETHYLBENZENE | PTE: 19,000 pounds per year |
| CAS No: 000108-88-3 Name: TOLUENE | PTE: 19,000 pounds per year |
| CAS No: 001330-20-7 Name: XYLENE, M, O & P MIXT. | PTE: 19,000 pounds per year |
| CAS No: 0NY100-00-0 Name: TOTAL HAP | PTE: 47,500 pounds per year |
| CAS No: 0NY998-00-0 Name: VOC | PTE: 95,000 pounds per year |

Condition 2: Capping Monitoring Condition

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Effective for entire length of Permit**Applicable Federal Requirement: 6 NYCRR 201-7.1****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 201-6

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.

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:

Emissions of volatile organic compounds (VOC) shall be less than 47.5 tons per year, calculated on a rolling monthly basis.

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

The facility shall compile and maintain records of the total usage of each coating, solvent, and the resulting emissions of volatile organic compounds in order to demonstrate continuous compliance with the cap. Records must be included with the annual report and kept on site for a minimum of five years.

Parameter Monitored: VOC

Upper Permit Limit: 47.5 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 3: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 3.1:

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

6 NYCRR Subpart 201-6
40 CFR Part 63, Subpart M

Item 3.2:

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

Item 3.3:

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 3.4:

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 3.5:

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

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

201 and of the Act.

Item 3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

| | |
|---------------------|--------------------------|
| CAS No: 000091-20-3 | NAPHTHALENE |
| CAS No: 000098-82-8 | BENZENE, (1-METHYLETHYL) |
| CAS No: 000100-41-4 | ETHYLBENZENE |
| CAS No: 000108-88-3 | TOLUENE |
| CAS No: 001330-20-7 | XYLENE, M, O & P MIXT. |
| CAS No: 000067-56-1 | METHYL ALCOHOL |

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Emissions of each individual hazardous air pollutant
(HAP) shall be less than 9.75 tons per year, calculated on
a rolling monthly basis.The facility shall compile and maintain records of the
total usage of each coating, solvent, and the resulting
emissions of hazardous air pollutants in order to
demonstrate continuous compliance with the cap. Records
must be included with the annual report and kept on site
for a minimum of five years.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 9.75 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 4: Capping Monitoring Condition
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 201-7.1****Item 4.1:**Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the
purpose of limiting emissions from the facility, emission unit or process to avoid being subject
to the following applicable requirement(s) that the facility, emission unit or process would
otherwise be subject to:6 NYCRR Subpart 201-6
40 CFR Part 63, Subpart M

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Item 4.2:

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

Item 4.3:

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 4.4:

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 4.5:

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 4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Emissions of total hazardous air pollutants (HAP) shall be less than 23.75 tons per year, calculated on a rolling monthly basis.

The facility shall compile and maintain records of the total usage of each coating, solvent, and the resulting emissions of hazardous air pollutants in order to demonstrate continuous compliance with the cap. Records must be included with the annual report and kept on site for a minimum of five years.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 23.75 tons per year

Monitoring Frequency: MONTHLY

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 5: Visible Emissions Limited
Effective for entire length of Permit

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 for entire length of Permit

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

Item 6.1:

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

| | |
|------------------------|-----------------------|
| Emission Unit: 0-00001 | Emission Point: 0003A |
| Emission Unit: 0-00001 | Emission Point: 0003B |
| Emission Unit: 0-00001 | Emission Point: 05S1A |
| Emission Unit: 0-00001 | Emission Point: 05S1B |
| Emission Unit: 0-00001 | Emission Point: 05S1C |
| Emission Unit: 0-00001 | Emission Point: 05S1D |
| Emission Unit: 0-00001 | Emission Point: 05SPA |
| Emission Unit: 0-00001 | Emission Point: 05SPB |
| Emission Unit: 0-00001 | Emission Point: 05SPC |
| Emission Unit: 0-00001 | Emission Point: 05SPD |
| Emission Unit: 0-00001 | Emission Point: 05SSA |
| Emission Unit: 0-00001 | Emission Point: 05SSB |
| Emission Unit: 0-00001 | Emission Point: 05SSC |

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

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

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per dry standard cubic foot of exhaust gas. Compliance testing will be conducted at the discretion of the Department.

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Reference Test Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective for entire length of Permit

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

Item 7.1:

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

Emission Unit: 0-00001
Process: 001 Emission Source: 00031

Emission Unit: 0-00001
Process: 002 Emission Source: 00031

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

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Filters for the sources listed shall be inspected for servicing every 6 months. If a filter is found to be not servicable, it shall be replaced. A record documenting the inspection and replacement of the filters shall be kept at the facility for a minimum of 5 years.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Condition 8: Once in always in
Effective for entire length of Permit

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

Item 8.1:

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

Condition 9: Compliance Demonstration
Effective for entire length of Permit

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

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator may not use any miscellaneous metal parts coatings with an as applied VOC content in excess of the limits specified in Table B4 of 6 NYCRR Part 228-1.4(b)(4) unless the facility has been granted a facility specific RACT variance by the Department. All record keeping, reports, sampling, and analysis must be conducted as described in 6 NYCRR Parts 228-1.3 and 228-1.6.

The as applied VOC content shall be calculated using the following formula:

$$(\text{VOC})_a = [(\text{Wv})_a - (\text{Ww})_a - (\text{We})_a] / [1 - ((\text{Vw})_a + (\text{Ve})_a)]$$

Where:

(VOC)_a is the VOC content of a coating, as applied, expressed as weight of VOC per volume of coating minus water and excluded compounds.

(Wv)_a is the weight of total volatiles per volume of an as applied coating.

(Ww)_a is the weight of water per volume of an as applied coating.

(We)_a is the weight of excluded compounds per volume of an as applied coating.

(Vw)_a is the volume of water per volume of an as applied coating.

(Ve)_a is the volume of excluded compounds per volume of an as applied coating.

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective for entire length of Permit

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

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Variance: The annual VOC emissions from non-compliant coatings shall not exceed 8 tons per year.

The facility shall submit any changes to the list of coatings used under this variance and listed in Process 002, with the coating MSDS, to the Department. Changes that meet all of the criteria given in 6 NYCRR Part 201-5.4(e) may be conducted without the prior approval of the Department and shall not require modification of the permit. The facility shall notify the Department 30 days in advance of any changes meeting the criteria given in 6 NYCRR Part 201-5.4(c).

On an annual basis, the responsible official shall provide a report to the Department which documents compliance with the 8 ton/year limit. The VOC emissions, total usage of each coating, and any make up solvent usage shall be included in the report.

Any exceedence of the 8 ton/year limit shall be grounds for the Department to revoke this variance.

This variance expires 5 years from the date of permit issuance.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 11: Compliance Demonstration
Effective for entire length of Permit

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Applicable Federal Requirement: 40CFR 63.11516(f), Subpart XXXXXX**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a welding affected source must comply with the requirements of paragraphs (1) and (2) below for each welding operation that uses materials that contain Metal Fabrication and Finishing HAPs (MFHAP) or that have the potential to emit MFHAP. For the purposes of this condition, the MFHAPs are compounds containing any of the following metals: Cadmium, Chromium, Lead, Manganese, and Nickel.

(1) The facility must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. To demonstrate compliance with this requirement, the owner or operator must maintain a record of the manufacturer's specifications for the capture and control devices, as specified in 40 CFR 63.11519(c)(4).

(2) The facility must implement one or more of the management practices specified in paragraphs (i) through (v) below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of engineering judgement.

(i) Use a welding process with reduced fume generation capabilities (e.g. gas metal arc welding (GMAW) - also called metal inert gas welding (MIG));

(ii) Use welding process variations (e.g. pulsed current GMAW) which can reduce fume generation rates;

(iii) Use welding filler materials, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;

(iv) Optimize welding process variables (e.g. electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and

(v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

If the facility uses more than 2,000 pounds of welding rod and wire during any 12-month period, the requirements of 40 CFR 63.11516(f)(3) - 63.11516(f)(8) apply in addition to the requirements listed above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 12: Compliance Demonstration
Effective for entire length of Permit**

**Applicable Federal Requirement: 40 CFR 63.11519, NESHAP Subpart
XXXXXX**

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- (a) The facility owner or operator must prepare and submit an initial notification, as described in 40 CFR 63.11519(a)(1), within 60 days of the effective date of this permit. In addition, the facility owner or operator must prepare and submit a notification of compliance status, as described in 40 CFR 63.11519(a)(2), within 120 days of the effective date of this permit.
- (b) The facility owner or operator must prepare and submit an annual report that contains the information specified in 40 CFR 63.11519(b)(4) through 40 CFR 63.11519(b)(7), as applicable, if the facility uses more than 2,000 pounds of welding rod and wire containing MFHAP during the preceding 12-month period. Annual reports submitted in accordance with this paragraph are due according to the schedule given in 40 CFR 63.11519(b)(2).
- (c) The facility owner or operator must keep the following records at the facility for a period of at least five years and make them available to the department upon request:
 - (1) A copy of each notification and report, and any supporting documentation, submitted in order to comply with 40 CFR 63 Subpart XXXXXX. This includes records of any applicability determinations and any changes to those determinations and the date(s) on which they occurred.

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

(2) Visual emissions determinations for any periods where the facility is required to make them.

(3) A copy of the site specific welding emissions management plan, if applicable.

(4) If the facility chooses to comply with 40 CFR 63 Subpart XXXXXX by operating any equipment according to manufacturer's instructions, copies of those instructions.

(5) Records indicating the amount of welding rod and wire used on a rolling 12-month basis.

Monitoring Frequency: ANNUALLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

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 in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction 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

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

with 6 NYCRR Part 616 - Public Access to Records.
Facility owners and/or operators must submit the records
required to comply with the request within sixty working
days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 13: Contaminant List
Effective for entire length of Permit

Applicable State Requirement:ECL 19-0301

Item 13.1:

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

CAS No: 000067-56-1
Name: METHYL ALCOHOL

CAS No: 000091-20-3
Name: NAPHTHALENE

CAS No: 000098-82-8
Name: BENZENE, (1-METHYLETHYL)

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

CAS No: 000100-41-4
Name: ETHYLBENZENE

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

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

CAS No: 0NY100-00-0
Name: TOTAL HAP

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

Condition 14: Malfunctions and Start-up/Shutdown Activities
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 201-1.4

Item 14.1:

(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 maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, 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 monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall 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. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. 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, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

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 15: Emission Unit Definition
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 15.1:

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

Emission Unit: 0-00001

Emission Unit Description:

Emission Unit 0-00001 consists of coating operations for metal reels including:
Solvent Wipe Cleaning (EP 05SSA, 05SSB, 05SSC, and 05SSD) Spray Painting (EP 0003A, 0003B, 05SPA, 05SPB, 05SPC, 05SPD) Oven Curing (EP 05SO1A and exempt source 05SO1B) and Plasma Cutter (EP 05BWE).

Building(s): 15
22
5S

Condition 16: Renewal deadlines for state facility permits
Effective for entire length of Permit

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

Item 16.1:

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 17: Compliance Demonstration
Effective for entire length of Permit

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

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Item 17.2:

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 4
1130 N. Westcott Rd.
Schenectady, NY 12306

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 18: Air pollution prohibited
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 211.1

Item 18.1:

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

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

Condition 19: Emission Point Definition By Emission Unit
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1:

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

Emission Unit: 0-00001

Emission Point: 0003A

Height (ft.): 12

Diameter (in.): 34

NYTMN (km.): 4701.7

NYTME (km.): 578.7

Building: 15

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

| | | | |
|-----------------------|----------------------|--------------|--|
| Emission Point: 0003B | | | |
| Height (ft.): 12 | Diameter (in.): 34 | | |
| NYTMN (km.): 4701.7 | NYTME (km.): 578.7 | Building: 15 | |
| | | | |
| Emission Point: 00S3C | | | |
| Height (ft.): 12 | Diameter (in.): 4 | | |
| NYTMN (km.): 4707.33 | NYTME (km.): 578.77 | Building: 15 | |
| | | | |
| Emission Point: 05BWE | | | |
| Height (ft.): 17 | Diameter (in.): 16 | | |
| NYTMN (km.): 4707.1 | NYTME (km.): 578.7 | Building: 5S | |
| | | | |
| Emission Point: 05S1A | | | |
| Height (ft.): 20 | Diameter (in.): 12 | | |
| NYTMN (km.): 4707.372 | NYTME (km.): 578.797 | Building: 22 | |
| | | | |
| Emission Point: 05S1B | | | |
| Height (ft.): 20 | Diameter (in.): 12 | | |
| NYTMN (km.): 4707.372 | NYTME (km.): 578.797 | Building: 22 | |
| | | | |
| Emission Point: 05S1C | | | |
| Height (ft.): 20 | Diameter (in.): 12 | | |
| NYTMN (km.): 4707.1 | NYTME (km.): 578.7 | Building: 22 | |
| | | | |
| Emission Point: 05S1D | | | |
| Height (ft.): 20 | Diameter (in.): 12 | | |
| NYTMN (km.): 4707.1 | NYTME (km.): 578.7 | Building: 22 | |
| | | | |
| Emission Point: 05SPA | | | |
| Height (ft.): 38 | Diameter (in.): 34 | | |
| NYTMN (km.): 4707.1 | NYTME (km.): 578.7 | Building: 5S | |
| | | | |
| Emission Point: 05SPB | | | |
| Height (ft.): 38 | Diameter (in.): 34 | | |
| NYTMN (km.): 4707.1 | NYTME (km.): 578.7 | Building: 5S | |
| | | | |
| Emission Point: 05SPC | | | |
| Height (ft.): 38 | Diameter (in.): 34 | | |
| NYTMN (km.): 4707.1 | NYTME (km.): 578.7 | Building: 5S | |
| | | | |
| Emission Point: 05SPD | | | |
| Height (ft.): 38 | Diameter (in.): 34 | | |
| NYTMN (km.): 4707.1 | NYTME (km.): 578.7 | Building: 5S | |
| | | | |
| Emission Point: 05SSA | | | |
| Height (ft.): 31 | Diameter (in.): 24 | | |
| NYTMN (km.): 4707.1 | NYTME (km.): 578.7 | Building: 5S | |
| | | | |
| Emission Point: 05SSB | | | |
| Height (ft.): 31 | Diameter (in.): 24 | | |
| NYTMN (km.): 4707.1 | NYTME (km.): 578.7 | Building: 5S | |

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Emission Point: 05SSC
 Height (ft.): 31 Diameter (in.): 24
 NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Emission Point: 05SSD
 Height (ft.): 31 Diameter (in.): 24
 NYTMN (km.): 4707.1 NYTME (km.): 578.7 Building: 5S

Condition 20: Process Definition By Emission Unit
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 20.1:

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

Emission Unit: 0-00001
 Process: 001 Source Classification Code: 4-02-020-33

Process Description:

Coating process which uses compliant coatings (i.e. coatings with less than 3.5 lbs/gal VOC content). The Department has previously approved the use of ICI/Devoe and Dupont Centari coating lines. This process includes Emission Sources: 0003A and 0003B (controlled by particulate filters), 05SPA, 05SPB, 05SPC, and 05SPD (controlled by water filters).

Emission Source/Control: 00S1A - Combustion

Emission Source/Control: 00S1B - Combustion

Emission Source/Control: 0003A - Control
 Control Type: FABRIC FILTER

Emission Source/Control: 0003B - Control
 Control Type: FABRIC FILTER

Emission Source/Control: 05SPA - Control
 Control Type: WATER CURTAIN

Emission Source/Control: 05SPB - Control
 Control Type: WATER CURTAIN

Emission Source/Control: 05SPC - Control
 Control Type: WATER CURTAIN

Emission Source/Control: 05SPD - Control
 Control Type: WATER CURTAIN

Emission Source/Control: 0003I - Process

Emission Source/Control: 0SPAI - Process

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Emission Source/Control: 0SPBI - Process

Emission Source/Control: 0SPCI - Process

Emission Source/Control: 0SPDI - Process

Item 20.2:

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

Emission Unit: 0-00001

Process: 002

Source Classification Code: 4-02-020-33

Process Description:

Coating process using coatings allowed under a variance (i.e. coatings with greater than 3.5 lbs/gal VOC content). The Department has previously approved the use of ICI/Devoe and Dupont Centari coating lines. This process includes Emission Sources: 0003A and 0003B (controlled by particulate filters), 05SPA, 05SPB, 05SPC, and 05SPD (controlled by water filters).

Emission Source/Control: 0003A - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0003B - Control
Control Type: FABRIC FILTER

Emission Source/Control: 05SPA - Control
Control Type: WATER CURTAIN

Emission Source/Control: 05SPB - Control
Control Type: WATER CURTAIN

Emission Source/Control: 05SPC - Control
Control Type: WATER CURTAIN

Emission Source/Control: 05SPD - Control
Control Type: WATER CURTAIN

Emission Source/Control: 0003I - Process

Emission Source/Control: 0SPAI - Process

Emission Source/Control: 0SPBI - Process

Emission Source/Control: 0SPCI - Process

Emission Source/Control: 0SPDI - Process

Item 20.3:

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

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Emission Unit: 0-00001

Process: 003

Source Classification Code: 3-09-030-99

Process Description:

Solvent wipe cleaning of metal parts (including wipe cleaning of oversize reels). Oversize reel wipe cleaning is a fugitive process which exhausts inside the building. This process includes emission points 05SSA, 05SSB, 05SSC, and 05SSD.

Emission Source/Control: 00SSA - Process

Design Capacity: 6,000 cubic feet per minute

Emission Source/Control: 00SSB - Process

Design Capacity: 6,000 cubic feet per minute

Emission Source/Control: 00SSC - Process

Design Capacity: 6,000 cubic feet per minute

Emission Source/Control: 00SSD - Process

Design Capacity: 6,000 cubic feet per minute

Item 20.4:

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

Emission Unit: 0-00001

Process: 004

Source Classification Code: 4-02-020-33

Process Description:

Painted/coated reel curing is performed in a large convection oven that is heated by four exempt burners that can operate separately or in tandem. This oven services paint lines 0SPAI, 0SPBI, 0SPCI, and 0SPDI and exhausts through emission points 05S1A and 05S1B and 05S1C and 05S1D

Emission Source/Control: 00S1A - Combustion

Emission Source/Control: 00S1B - Combustion

Emission Source/Control: 00S1C - Combustion

Emission Source/Control: 00S1D - Combustion

Emission Source/Control: 00SO1 - Process

Emission Source/Control: 0SPAI - Process

Emission Source/Control: 0SPBI - Process

Emission Source/Control: 0SPCI - Process

Emission Source/Control: 0SPDI - Process

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001

Item 20.5:

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

Emission Unit: 0-00001

Process: 005

Source Classification Code: 3-09-030-99

Process Description:

Plasma cutter is utilized to cut steel, stainless steel
and aluminum.

Emission Source/Control: 05BWE - Process

Emission Source/Control: 5BWEI - Process

Item 20.6:

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

Emission Unit: 0-00001

Process: 006

Source Classification Code: 4-02-020-33

Process Description:

Painted/coated reel curing is performed in a large
convection oven that is heated by exempt burners that can
operate separately or intandem. This oven services paint
line 0003I and exhausts through emission points 0003A and
0003B.

Emission Source/Control: 0003A - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0003B - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0003I - Process

Permit ID: 4-0138-00001/00031

Facility DEC ID: 4013800001