

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type:	Air State Facility
Permit ID:	5-0913-00116/00002

Effective Date: 12/23/2020 Expiration Date: 12/22/2030

Permit Issued To:IEC HOLDEN CORPORATION

8180 Cote De Liesse Rd Montreal, QC H4T 1G8

Contact: STEVEN RONDEAU

51 Distribution Way Plattsburgh, NY 12901 (518) 213-3991

Facility: IEC HOLDEN CORP

DOCK DOORS 61/63 DISTRIBUTION WAY

PLATTSBURGH, NY 12901

Contact: PATRICK BAKER

IEC HOLDEN CORP

51 DISTRIBUTION WAY STE 102

PLATTSBURGH, NY 12901

(514) 241-2131

Description:

The Facilty manufactures electric propulsion and electric powertrain components. Key processes include vacuum pressure impregnation (VPI), curing (ovens), and coating (spray booth).

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:	ERIN L BURNS
	NYSDEC - REGION 5

PO BOX 296

RAY BROOK, NY 12977-0296

Authorized Signature:	Date: / /
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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



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DEC GENERAL CONDITIONS

General Provisions

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- 4 3 Applications for permit renewals, modifications and transfers
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- 5 5 Submission of application for permit modification or renewal-REGION 5 SUBOFFICE WARRENSBURG



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.

Division of Air Resources



Facility DEC ID: 5091300116

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 5
SUBOFFICE - WARRENSBURG
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 5 Sub-office Division of Environmental Permits 232 Golf Course Road Warrensburg, NY 12885-1172 (518) 623-1281



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:IEC HOLDEN CORPORATION

8180 Cote De Liesse Rd Montreal, QC H4T 1G8

Facility: IEC HOLDEN CORP

DOCK DOORS 61/63 DISTRIBUTION WAY

PLATTSBURGH, NY 12901

Authorized Activity By Standard Industrial Classification Code:

3621 - MOTORS AND GENERATORS

Permit Effective Date: 12/23/2020 Permit Expiration Date: 12/22/2030



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FEDERALLY ENFORCEABLE CONDITIONS

FINAL **** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



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)



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

FEDERAL APPLICABLE REQUIREMENTS The following conditions are federally enforceable.

Condition 1: Visible Emissions Limited

Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 6 NYCRR 211.2

Item 1.1:

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 2: Compliance Demonstration

Effective between the dates of 12/23/2020 and 12/22/2030

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

Item 2.1:

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

Emission Unit: U-00002 Emission Point: 00011

Process: 003

Emission Unit: U-00002 Emission Point: 00012

Process: 003

Emission Unit: U-00002 Emission Point: 00015

Process: 003

Emission Unit: U-00002 Emission Point: 00016

Process: 003

Item 2.2:

Compliance Demonstration shall include the following monitoring:



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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Since normal operation of the source does not result in visible emissions, the permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: 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: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 3: Compliance Demonstration

Effective between the dates of 12/23/2020 and 12/22/2030

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

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.



Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

The control of particulate emissions released from new and modified process emission sources.

Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

As per 212-1.7(a) 'Sampling and monitoring' section, facility owners and/or operators of a process emission source required by the department to demonstrate compliance with this Part may be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to Part 202 of this Title using EPA Test Reference Method 5.

Parameter Monitored: PM-10

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Averaging Method: AVERAGING METHOD - SEE MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration

Effective between the dates of 12/23/2020 and 12/22/2030

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

Item 4.1:

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

Emission Unit: U-00001

Process: 001

Emission Unit: U-00001



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Process: 002

Emission Unit: U-00002

Process: 003

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

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

This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam – see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions persist after corrections are made, the permittee will immediately notify the department and may be required to conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

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

** NOTE ** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The



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

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 5: Compliance Demonstration

Effective between the dates of 12/23/2020 and 12/22/2030

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

Item 5.1:

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

Emission Unit: U-00001

Process: 001

Emission Unit: U-00001

Process: 002

Emission Unit: U-00002

Process: 003

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

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

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless



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equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) clean hand held spray guns by one of the following:
- (1) an enclosed spray gun cleaning system that is kept closed when not in use;
- (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
- (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
- (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions. Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:
- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Paint spray applicability

Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 40CFR 63.11169(c), Subpart HHHHHH

Item 6.1:

This Condition applies to:



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Emission Unit: U00002

Process: 003

Item 6.2:

The requirements of Subpart HHHHHH apply to spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium, collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

Condition 7: General requirements

Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 40CFR 63.11173(e)(2), Subpart HHHHHHH

Item 7.1:

This Condition applies to:

Emission Unit: U00002

Process: 003

Item 7.2:

All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

- (i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see § 63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
- (ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.
- (iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth



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during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

Condition 8: Applicability of general provisions

Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 40CFR 63.11174, Subpart HHHHHH

Item 8.1:

This Condition applies to:

Emission Unit: U00002

Process: 003

Item 8.2:

(a) Table 1 of this 40 CFR part 63 subpart HHHHHHH shows which parts of the General Provisions in 40 CFR part 63 subpart A apply to the facility.

(b) If you are an owner or operator of an area source subject to 40 CFR part 63 subpart HHHHHHH, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of 40 CFR part 63 subpart HHHHHHH applicable to area sources.

Condition 9: Compliance Demonstration

Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 40CFR 63.11176(a), Subpart HHHHHHH

Item 9.1:

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

Emission Unit: U-00002

Process: 003

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source is required to submit a report in each calendar year in which information previously submitted in



either the initial notification required by 40 CFR 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this condition, has changed. Deviations from the relevant requirements in 40 CFR 63.11173(a) through (d) or 40 CFR 63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with 40 CFR 63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (1) and (2).

- (1) The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
- (2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of subpart HHHHHH or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Compliance Demonstration Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 40CFR 63.11177, Subpart HHHHHH

Item 10.1:

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

Emission Unit: U-00002

Process: 003

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Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

If you are the owner or operator of a surface coating operation, you must keep the records specified in

paragraphs (a) through (d) and (g) below. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) below, as applicable.

- (a) Certification that each painter has completed the training specified in § 63.11173(f) with the date the initial training and the most recent refresher training was completed.
- (b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in § 63.11173(e)(3)(i).
- (c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in § 63.11173(e)(4).
- (d) Copies of any notification submitted as required by § 63.11175 and copies of any report submitted as required by § 63.11176.
- (e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).
- (f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.
- (g) Records of any deviation from the requirements in § 63.11173, § 63.11174, § 63.11175, or § 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
- (h) Records of any assessments of source compliance



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performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 11: Certification for painters

Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 40CFR 63.11173(e)(1), Subpart HHHHHH

Item 11.1:

This Condition applies to Emission Unit: U-00002

Process: 003

Item 11.2:

Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must ensure that all painters are certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in §63.11173(f). The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in §63.11173(f).

This condition does not apply to students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this condition.

Condition 12: Compliance Demonstration
Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement:40CFR 63.11173(e)(3), Subpart HHHHHHH

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Process: 003

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All spray-applied coatings must be applied with a high

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volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Compliance Demonstration Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 40CFR 63.11173(e)(4), Subpart HHHHHHH

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Process: 003

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 40CFR 63.11173(f), Subpart HHHHHHH

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Process: 003



Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (1) through (3) of this section.

- (1) A list of all current personnel by name and job description who are required to be trained;
- (2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.
- (i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
- (ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
- (iii) Routine spray booth and filter maintenance, including filter selection and installation.
- (iv) Environmental compliance with the requirements of this subpart.
- (3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 15: Compliance Demonstration
Effective between the dates of 12/23/2020 and 12/22/2030

Applicable Federal Requirement: 40CFR 63.11173(g), Subpart HHHHHH

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Process: 003

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

- (1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
- (2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
- (3) Training and certification will be valid for a period



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not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

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 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 16: Contaminant List

Effective between the dates of 12/23/2020 and 12/22/2030

Applicable State Requirement: ECL 19-0301

Item 16.1:

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

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

CAS No: 0NY075-00-5

Name: PM-10

Condition 17: Malfunctions and start-up/shutdown activities
Effective between the dates of 12/23/2020 and 12/22/2030

Applicable State Requirement: 6 NYCRR 201-1.4

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Item 17.1:

- (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 18: Emission Unit Definition
Effective between the dates of 12/23/2020 and 12/22/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 18.1:

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

Emission Unit: U-00001 Emission Unit Description:

This emission unit is comprised of the resin application and curing process. There are two (2) vacuum pressure impregnation systems (VPI 1 and VPI 2). Electrical parts are impregnated with resin under vacuum and pressure.



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After VPI, parts are cured in ovens for approximately 8 hours. Oven 1 and Oven 2 are dedicated to VPI 1. Oven 3 and Oven 4 are dedicated to VPI 2. There is one (1) resin dip tank and two (2) additional ovens (F1 Oven 1 and F1 Oven 2) as well.

Building(s): BLDG 1

Item 18.2:

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

Emission Unit: U-00002 Emission Unit Description:

This emission unit consists of one spray booth and a HVLP spray gun. The spray booth exhaust is equipped with HEPA filters, which achieve control efficiencies of which are 99% or greater. After paint is applied, the parts are transferred to a drying area. Occasionally parts are specifically sprayed with Macropoxy or Pro Industrial coatings and dried in Oven 5 and/or Oven 6. These ovens are more typically used to heat uncoated parts, in preparation for further processing; this step is not associated with emissions.

Building(s): BLDG 1

Condition 19: Renewal deadlines for state facility permits
Effective between the dates of 12/23/2020 and 12/22/2030

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

Item 19.1:

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 20: CLCPA Applicability

Effective between the dates of 12/23/2020 and 12/22/2030

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

Item 20.1:

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.

Condition 21: Compliance Demonstration

Effective between the dates of 12/23/2020 and 12/22/2030



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

Item 21.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 21.2:

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 5 232 Golf Course Rd. Warrensburg, NY 12885

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 22: Air pollution prohibited Effective between the dates of 12/23/2020 and 12/22/2030

Applicable State Requirement: 6 NYCRR 211.1

Item 22.1:

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 23: Compliance Demonstration Effective between the dates of 12/23/2020 and 12/22/2030

Applicable State Requirement: 6 NYCRR 212-2.1

Item 23.1:

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

Emission Unit: U-00002 Emission Point: 00011

Process: 003

Emission Unit: U-00002 Emission Point: 00012

Process: 003



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Emission Unit: U-00002 Emission Point: 00015

Process: 003

Emission Unit: U-00002 Emission Point: 00016

Process: 003

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point are restricted as follows:

- (a) for an air contaminant listed in Section 212-2.2 Table 2 High Toxicity Air Contaminant List, of this Part, the facility owner or operator shall either limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4 Degree of Air Cleaning Required for Non-Criteria Air Contaminants, of this Part for the environmental rating assigned to the contaminant by the department.
- (b) for any air contaminant not listed on Table 2, unless it is a solid particulate described in subdivision (c) of this Section, the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the department.
- (c) for a solid particulate assigned an environmental rating of B or C emitted from a process emission source, the facility owner or operator shall not allow emissions of particulate to exceed the requirements specified in Subpart 212-2.4 of this Part.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**** Emission Unit Level ****



Condition 24: Emission Point Definition By Emission Unit Effective between the dates of 12/23/2020 and 12/22/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 24.1:

Emission Point:

00014

Height (ft.): 29

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

Emission Unit: U-00001 **Emission Point:** 00001 Height (ft.): 29 Diameter (in.): 2 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1 Emission Point: 00002 Height (ft.): 29 Diameter (in.): 8 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1 **Emission Point:** 00003 Height (ft.): 29 Diameter (in.): 8 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1 Emission Point: 00004 Height (ft.): 29 Diameter (in.): 10 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1 **Emission Point:** 00006 Height (ft.): 29 Diameter (in.): 2 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1 **Emission Point:** 00007 Diameter (in.): 2 Height (ft.): 29 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1 **Emission Point:** 00008 Height (ft.): 29 Diameter (in.): 8 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1 **Emission Point:** 00009 Height (ft.): 29 Diameter (in.): 8 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1 Emission Point: 00010 Height (ft.): 29 Diameter (in.): 8 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1 **Emission Point:** 00013 Height (ft.): 29 Length (in.): 14 Width (in.): 14 NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1

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Length (in.): 14

Width (in.): 14



NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1

Item 24.2:

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

Emission Unit: U-00002

Emission Point: 00011

Height (ft.): 29 Diameter (in.): 24

NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1

Emission Point: 00012

Height (ft.): 29 Diameter (in.): 9

NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1

Emission Point: 00015

Height (ft.): 29 Diameter (in.): 4

NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1

Emission Point: 00016

Height (ft.): 29 Diameter (in.): 9

NYTMN (km.): 4948.627 NYTME (km.): 621.283 Building: BLDG 1

Condition 25: Process Definition By Emission Unit Effective between the dates of 12/23/2020 and 12/22/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 25.1:

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

Emission Unit: U-00001

Process: 001 Source Classification Code: 4-02-008-01

Process Description:

Vacuum Pressure Impregnation (VPI) is a process where electrical components (i.e., stator) are impregnated with a resin under vacuum and pressure. After VPI, motors are cured in ovens for approximately 8 hours. Oven 1 and Oven 2 are dedicated to VPI 1; Oven 3 and Oven 4 are dedicated to VPI 2.

Emission Source/Control: OVN-1 - Process

Emission Source/Control: OVN-2 - Process

Emission Source/Control: OVN-3 - Process

Emission Source/Control: OVN-4 - Process

Emission Source/Control: VPI-1 - Process

Emission Source/Control: VPI-2 - Process

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Item 25.2:

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

Emission Unit: U-00001

Process: 002 Source Classification Code: 4-02-043-30

Process Description:

The Resin Dip Tank is a process where alternators are submerged into resin for approximately 0.5 hour. The Resin Dip Tank is kept closed unless it is in use. Following the resin soaking process, the alternator is placed in an oven (F1 Oven 1 and/or F1 Oven 2) to cure for approximately 8

hours.

Emission Source/Control: FOVN1 - Process

Emission Source/Control: FOVN2 - Process

Emission Source/Control: RDT-1 - Process

Item 25.3:

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

Emission Unit: U-00002

Process: 003 Source Classification Code: 4-02-008-01

Process Description:

Paints and coatings are applied to parts in the spray booth via an HVLP spray gun. The spray booth exhaust is equipped with HEPA filters, which achieve control efficiencies of which are 99% or greater. After paint is applied, the parts are transferred to a drying area. Occasionally parts are specifically sprayed with Macropoxy or Pro Industrial coatings or similiar coating and dried in Oven 5 and/or Oven 6. These ovens are more typically used to heat uncoated parts, in preparation for further processing; this step is not associated with emissions.

Emission Source/Control: HEF-1 - Control

Control Type: FABRIC FILTER

Emission Source/Control: DRY-1 - Process

Emission Source/Control: OVN-5 - Process

Emission Source/Control: OVN-6 - Process

Emission Source/Control: SPB-1 - Process



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