

Facility DEC ID: 5094200311

**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 5-0942-00311/00001  
Effective Date: 09/16/2025 Expiration Date: 09/15/2035

Permit Issued To: JEFFORDS STEEL AND SPECIALTY COMPANY, INC.  
4398 RTE 22  
PLATTSBURGH, NY 12901

Contact: ALLEN FESSETTE  
4398 rOUTE 22  
PLATTSBURGH, NY 12901  
(518) 561-4061

Facility: JEFFORDS STEEL & ENGINEERING CO  
4398 ST RTE 22  
Plattsburgh, NY 12901

Description:  
Jeffords Steel and Engineering Company fabricates steel members and miscellaneous metal parts for use in building construction. The steel members are coated with extreme performance coatings. This coating process comprises emission unit U-PAINT which is located in one building. SPRY1 and SPRY2 are the two emission sources for this unit. They exhaust to the atmosphere through emission points 00001 and 00002.

All air pollutants are regulated under state requirements. This permit limits the facility emissions as follows: VOC's to 39 tons per year, Individual HAPs to 7.9 tons per year, and Total HAPs to 19.9 tons per year. Also, the coatings they use are subject to the 6 NYCRR Part 228 limit of 3.5 pounds VOC per gallon of as-applied coating (minus water and excluded VOC).

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 M DONHAUSER  
NYSDEC - REGION 5  
232 GOLF COURSE RD  
WARRENSBURG, NY 12885-1172

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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- 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 5 HEADQUARTERS

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**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.

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**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 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 5 Headquarters  
Division of Environmental Permits  
Route 86, PO Box 296  
Ray Brook, NY 12977-0296  
(518) 897-1234

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**Permit Under the Environmental Conservation Law (ECL)**

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: JEFFORDS STEEL AND SPECIALTY COMPANY, INC.  
4398 RTE 22  
PLATTSBURGH, NY 12901

Facility: JEFFORDS STEEL & ENGINEERING CO  
4398 ST RTE 22  
Plattsburgh, NY 12901

Authorized Activity By Standard Industrial Classification Code:  
3441 - FABRICATED STRUCTURAL METAL

Permit Effective Date: 09/16/2025

Permit Expiration Date: 09/15/2035

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**FEDERALLY ENFORCEABLE CONDITIONS**

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- 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
- 10 \*4 6 NYCRR 201-7.1: Capping Monitoring Condition
- 12 5 6 NYCRR 211.2: Visible Emissions Limited
- 12 6 40CFR 63.11519(b), Subpart XXXXXX: Compliance Demonstration
- 12 7 40CFR 63.11519(c), Subpart XXXXXX: Compliance Demonstration

**Emission Unit Level**

**EU=U-PAINT,Proc=PNT**

- 13 8 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 15 9 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 16 15 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 17 10 6 NYCRR 228-1.4 (b) (4) (ii): Compliance Demonstration

**EU=U-PAINT,Proc=XXX**

- 18 11 40CFR 63.11516(b), Subpart XXXXXX: Compliance Demonstration
- 19 12 40CFR 63.11516(f), Subpart XXXXXX: Compliance Demonstration
- 19 13 40CFR 63.11516(f), Subpart XXXXXX: Compliance Demonstration

**EU=U-PAINT,Proc=XXX,ES=BLAST**

- 20 14 40CFR 63.11516(a), Subpart XXXXXX: Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 24 16 ECL 19-0301: Contaminant List
- 25 17 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 26 18 6 NYCRR Subpart 201-5: Emission Unit Definition
- 26 19 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 26 20 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 27 21 6 NYCRR 211.1: Air pollution prohibited
- 27 22 6 NYCRR 212-2.2: Compliance Demonstration
- 28 23 6 NYCRR 212-2.2: Compliance Demonstration
- 29 24 6 NYCRR 212-2.2: Compliance Demonstration

**Emission Unit Level**

- 30 25 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 30 26 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.

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**FEDERALLY ENFORCEABLE CONDITIONS**

Renewal 2/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,

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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**

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**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: Facility Permissible Emissions**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**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: 000098-82-8 Name: BENZENE, (1-METHYLETHYL)	PTE: 15,800 pounds per year
CAS No: 000100-41-4 Name: ETHYLBENZENE	PTE: 15,800 pounds per year
CAS No: 000100-42-5 Name: STYRENE	PTE: 15,800 pounds per year
CAS No: 000108-10-1 Name: 2-PENTANONE, 4-METHYL	PTE: 15,800 pounds per year
CAS No: 000108-88-3 Name: TOLUENE	PTE: 15,800 pounds per year
CAS No: 001330-20-7 Name: XYLENE, M, O & P MIXT.	PTE: 15,800 pounds per year
CAS No: 0NY100-00-0 Name: TOTAL HAP	PTE: 39,800 pounds per year
CAS No: 0NY998-00-0 Name: VOC	PTE: 78,000 pounds per year

**Condition 2: Capping Monitoring Condition**

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**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 201-6.1 (a)

**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:  
Facility wide emissions of Volatile Organic Compounds (VOCs) shall not exceed 39 tons per year (78,000 lbs per year) during any consecutive 12-month period, rolled

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monthly. The facility must monitor the emissions from the facility and maintain the monthly and 12-month rolling total records. Each 12-month VOCs emission total must be below the permitted limit of 39 tons.

Records shall be maintained on-site which demonstrate compliance with this limit. These records shall include the mass emissions totaled over each month and the total mass emissions over each rolling 12 month period. Calculations based based on records of all coatings and solvents used at the facility, assuming that all VOCs contained in the coatings and solvents shall be emitted.

The owner or operator shall submit an annual report of monthly and 12-month rolling total emission to document compliance with the permitted limit of 39 tons per year.

Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Parameter Monitored: VOC's  
 Upper Permit Limit: 39 tons per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2026.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 3: Capping Monitoring Condition**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**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 201-6.1 (a)

**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

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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 201 and of the Act.

**Item 3.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000098-82-8	BENZENE, (1-METHYLETHYL)
CAS No: 000100-41-4	ETHYLBENZENE
CAS No: 000100-42-5	STYRENE
CAS No: 000108-10-1	2-PENTANONE, 4-METHYL
CAS No: 000108-88-3	TOLUENE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.

**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:

Facility wide emissions of individual Hazardous Air Pollutant (HAP) shall not exceed 7.9 tons per year (15,800 lbs per year) during any consecutive 12-month period, rolled monthly. The facility must monitor the emissions from the facility and maintain the monthly and 12-month rolling total records. Each 12-month individual emission total must be below the permitted limit of 7.9 tons.

Records shall be maintained on-site which demonstrate compliance with this limit. These records shall include the mass emissions totaled over each month and the total mass emissions over each rolling 12 month period. Calculations shall based on records of all coatings and solvents used at the facility, assuming that all HAPs contained in the coatings and solvents shall be

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emitted.

Xylene is listed as the target contaminant because it is expected to be the individual HAP emitted in the largest quantity. However, if emissions of another HAP exceed the emissions of Xylene, that contaminant shall be reported.

The owner or operator shall submit an annual report of monthly and 12-month rolling total emission to document compliance with the permitted limit of 7.9 tons per year.

Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Parameter Monitored: XYLENE, M, O & P MIXT.  
 Upper Permit Limit: 7.9 tons per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2026.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 4: Capping Monitoring Condition**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**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 201-6.1 (a)

**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:**

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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:

Facility wide emissions of Hazardous Air Pollutants (HAPs) shall not exceed 19.9 tons per year (39,800 lbs per year) during any consecutive 12-month period, rolled monthly. The facility must monitor the emissions from the facility and maintain the monthly and 12-month rolling total records. Each 12-month HAPs emission total must be below the permitted limit of 19.9 tons.

Records shall be maintained on-site which demonstrate compliance with this limit. These records shall include the mass emissions totaled over each month and the total mass emissions over each rolling 12 month period. Calculations shall be based on records of all coatings and solvents used at the facility, assuming that all HAPs contained in the coatings and solvents shall be emitted.

The owner or operator shall submit an annual report of monthly and 12-month rolling total emission to document compliance with the permitted limit of 19.9 tons per year.

Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

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Parameter Monitored: TOTAL HAP  
Upper Permit Limit: 19.9 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2026.  
Subsequent reports are due every 12 calendar month(s).

**Condition 5: Visible Emissions Limited**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 5.1:**

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

**Condition 6: Compliance Demonstration**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable Federal Requirement:40CFR 63.11519(b), Subpart XXXXXX**

**Item 6.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any facility subject to the provisions in 40 CFR 63, subpart XXXXXX must prepare and submit annual certification and compliance reports for each affected source according to the requirements of §63.11519(b)(2)-(6).

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2026.  
Subsequent reports are due every 12 calendar month(s).

**Condition 7: Compliance Demonstration**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

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**Applicable Federal Requirement:40CFR 63.11519(c), Subpart XXXXXX**

**Item 7.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

The facility must collect and keep records of the data and information specified in §63.11519(c)(1)-(14), according to the provisions in §63.11519(c)(15).

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2026.  
Subsequent reports are due every 12 calendar month(s).

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

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

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

**Item 8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT  
Process: PNT

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting a Method 9 opacity evaluation at a minimum frequency of once per year, while the source is in normal operating mode.

In addition to the above opacity evaluation, the permittee

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

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

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

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

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Compliance Demonstration**  
Effective between the dates of 09/16/2025 and 09/15/2035

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

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Process: PNT

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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**Condition 15: Compliance Demonstration**  
Effective between the dates of 09/16/2025 and 09/15/2035

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

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT  
Process: PNT

**Item 15.2:**

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 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

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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: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

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

**Item 10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT  
 Process: PNT

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

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A facility operating a Miscellaneous Metal Parts Coatings coating line may not use coatings with VOC contents, as applied, which exceed the appropriate limits specified in Table B4 of 6 NYCRR Subpart 228-1.4(b)(4). The units in Table B4 are in terms of pounds of VOC per gallon of coating (minus water and excluded compounds) at application. Sampling and testing of any coating to confirm VOC content compliance must be performed in a manner directed by and at the request of the Department.

For miscellaneous metal parts coating the following types

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of coatings and coating operations are exempt from the VOC content limits of table B4:

- (a) stencil coating;
- (b) safety-indicating coatings;
- (c) solid-film lubricants;
- (d) electric-insulating and thermal-conducting coatings;
- (e) magnetic data storage disk coatings; and
- (f) plastic extruded into metal parts to form a coating.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 11: Compliance Demonstration**  
Effective between the dates of 09/16/2025 and 09/15/2035

**Applicable Federal Requirement:40CFR 63.11516(b), Subpart XXXXXX**

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT  
Process: XXX

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility owns or operates a machining affected source, the facility must implement management practices to minimize emissions of metal fabrication HAP (MFHAP) as specified below:

- 1) The facility must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as applicable; and
- 2) The facility must operate all equipment associated with machining according to manufacturer's instructions.

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Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 12: Compliance Demonstration**  
Effective between the dates of 09/16/2025 and 09/15/2035

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

**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT  
Process: XXX

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22. You must conduct the Method 22 test while the affected welding source is operating under normal conditions at the primary vent, stack exit or opening from the building containing welding operations. The duration of each Method 22 test must be at least 15 minutes, and visible emissions will be considered present if they are detected for more than six minutes of the fifteen minute period.

Method 22 testing must be performed once per 60 days of operation of the process. If visible fugitive emissions are detected during any of these tests, more frequent testing will be required according to the graduated schedule in 63.11517(b).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2026.  
Subsequent reports are due every 12 calendar month(s).

**Condition 13: Compliance Demonstration**  
Effective between the dates of 09/16/2025 and 09/15/2035

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

**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

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Process: XXX

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This condition applies when performing welding operations that use materials containing metal fabricating HAPs.

The owner or operator must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions.

The owner or operator must implement one or more of the following management practices to minimize emissions of metal fabricating HAPs, as practicable, while maintaining the required welding quality through the application of sound engineering judgement:

- 1) Use welding processes with reduced fume generating capabilities;
- 2) Use welding process variations (e.g. pulsed current GMAW) which can reduce fume generation rates;
- 3) Use welding filler materials, shielding gases, carrier gases, or other process materials which are capable of reducing welding fume generation;
- 4) 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
- 5) Use a welding capture and control system, operated according to manufacturer's specifications.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 14: Compliance Demonstration**

**Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable Federal Requirement:40CFR 63.11516(a), Subpart XXXXXX**

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

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Emission Unit: U-PAINT

Process: XXX

Emission Source: BLAST

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility owns or operates a dry abrasive blasting affected source which consists of a dry abrasive blasting operation which is performed on objects greater than 8 feet in any one dimension, the facility may implement management practices to minimize emissions of metal fabrication HAPs (MFHAPs) as specified below:

(i)

1) The facility must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

2) The facility must enclose abrasive material storage areas and holding bins, seal chutes, and conveyors that transport abrasive material; and

3) The facility must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions; and

4) The facility must not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and

5) Whenever practicable, the facility must switch from high particulate matter(PM)-emitting blast media (e.g. sand) to low PM-emitting blast media (e.g. crushed glass, specular hematite, steel shot, aluminum oxide), where PM is a surrogate for MFHAP.

(ii) The facility must perform visual determinations of fugitive emissions, as specified in 40 CFR 63.11517(b) according to paragraphs 1) or 2), as applicable.

1) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, the facility must perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation.

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2) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, the facility must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.

(iii) The facility must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in 40 CFR 63.11519(c)(2).

(iv) If visible fugitive emissions are detected, the facility must perform corrective actions until the visible fugitive emissions are eliminated, at which time the facility must comply with the requirements in paragraphs 1) and 2).

1) The facility must perform a follow-up inspection for visible fugitive emissions in accordance with 40 CFR 63.11517(a).

2) The facility must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with the annual certification and compliance report as required by 40 CFR 63.11519(b)(5).

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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**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

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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 09/16/2025 and 09/15/2035**

**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: 000050-00-0  
 Name: FORMALDEHYDE

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

CAS No: 000100-41-4  
 Name: ETHYLBENZENE

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CAS No: 000100-42-5

Name: STYRENE

CAS No: 000108-10-1

Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 001330-20-7

Name: XYLENE, M, O &amp; P MIXT.

CAS No: 028182-81-2

Name: DIISOCYANATE,1-6-HEXAMETHYLENE

CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 17: Malfunctions and Start-up/Shutdown Activities**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable State Requirement:6 NYCRR 201-1.4**

**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 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.

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(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 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 09/16/2025 and 09/15/2035**

**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-PAINT

Emission Unit Description:

This emission unit is comprised of the structural steel surface coating process, and its associated emission sources. This unit has three airless paint spray guns as emission sources, SPRY1, SPRY2 and SPRY 3 and two emission points, 00001 and 00002. It also includes metal fabrication processes including cutting, drilling, abrasive blasting and welding.

Building(s): JSE

**Condition 19: Renewal deadlines for state facility permits**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**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: Compliance Demonstration**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

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

**Item 20.1:**

The Compliance Demonstration activity will be performed for the Facility.

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**Item 20.2:**

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: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

**Condition 21: Air pollution prohibited**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 21.1:**

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 22: Compliance Demonstration**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable State Requirement:6 NYCRR 212-2.2**

**Item 22.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000050-00-0      FORMALDEHYDE

**Item 22.2:**

Compliance Demonstration shall include the following monitoring:

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

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Monitoring Description:

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 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.

Formaldehyde = 100 pounds per year

The owner or operator shall maintains records of the amount of coating used in the surface coating operation (emission source - airless spray guns SPRY1, SPRY2 and SPRY3) to demonstrate the actual annual Formaldehyde emissions must be less than 100 pounds/year.

All monitoring records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Parameter Monitored: FORMALDEHYDE  
 Upper Permit Limit: 100 pounds per year  
 Monitoring Frequency: ANNUALLY  
 Averaging Method: ANNUAL TOTAL  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2026.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 23: Compliance Demonstration**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable State Requirement:6 NYCRR 212-2.2**

**Item 23.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
 CAS No: 028182-81-2 DIISOCYANATE,1-6-HEXAMETHYLENE

**Item 23.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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 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.

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Diisocyanate compounds = 100 pounds per year

The owner or operator shall maintains records of the amount of coating used in the surface coating operation (emission source - airless spray guns SPRY1, SPRY2 and SPRY3) to demonstrate the actual annual Diisocyanate compounds emissions must be less than 100 pounds/year.

All monitoring records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Parameter Monitored: DIISOCYANATE,1-6-HEXAMETHYLENE  
 Upper Permit Limit: 100 pounds per year  
 Monitoring Frequency: ANNUALLY  
 Averaging Method: ANNUAL TOTAL  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2026.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 24: Compliance Demonstration**  
**Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable State Requirement:6 NYCRR 212-2.2**

**Item 24.1:**  
 The Compliance Demonstration activity will be performed for the Facility.

**Item 24.2:**  
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – high toxicity air contaminant list, the facility owner or operator shall limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for an individual HTAC. If the limit is exceeded the facility owner or operator must demonstrate compliance with the air cleaning requirements for the HTAC(s) as specified in subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants.

The facility owner or operator shall have a Department approved monitoring plan and monitor the emissions of the HTAC(s) and report to the Department annually to prove compliance with the limit(s).

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Averaging Method: ANNUAL TOTAL  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2026.  
Subsequent reports are due every 12 calendar month(s).

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

**Condition 25: Emission Point Definition By Emission Unit  
Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 25.1:**

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

Emission Unit: U-PAINT

Emission Point: 00001  
Height (ft.): 5 Diameter (in.): 36  
NYTMN (km.): 4946.79 NYTME (km.): 620.102 Building: JSE

Emission Point: 00002  
Height (ft.): 5 Diameter (in.): 37  
NYTMN (km.): 4946.634 NYTME (km.): 620.125 Building: JSE

Emission Point: 00003  
Height (ft.): 8 Diameter (in.): 42  
NYTMN (km.): 4946.634 NYTME (km.): 620.125 Building: JSE

Emission Point: 00004  
Height (ft.): 8 Diameter (in.): 42  
NYTMN (km.): 4946.634 NYTME (km.): 620.125 Building: JSE

Emission Point: 00005  
Height (ft.): 8 Diameter (in.): 10  
NYTMN (km.): 4946.69 NYTME (km.): 620.254 Building: JSE

**Condition 26: Process Definition By Emission Unit  
Effective between the dates of 09/16/2025 and 09/15/2035**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 26.1:**

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

Emission Unit: U-PAINT  
Process: PNT Source Classification Code: 4-02-006-10  
Process Description:

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Surface coating of fabricated steel and metal parts with primers and harsh environmental coatings. Coatings do not contain metal fabricating and finishing hazardous air pollutants (MFHAPs) listed in 40 CFR 63 Subpart XXXXXX.

This process has three emission sources, Airless spray guns SPRY1, SPRY2 and SPRY3 which vent through emission points 00001 and 00002.

Emission Source/Control: FILT1 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: FILT2 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: SPRY1 - Process  
Design Capacity: 0.95 gallons per minute

Emission Source/Control: SPRY2 - Process  
Design Capacity: 0.95 gallons per minute

Emission Source/Control: SPRY3 - Process

**Item 26.2:**

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

Emission Unit: U-PAINT  
Process: XXX Source Classification Code: 3-03-015-01  
Process Description:

Metal fabrication including cutting, drilling, abrasive blasting and welding. These functions are subject to 40 CFR 63 Subpart XXXXXX when using materials containing Cadmium, Chromium, Lead, Nickel or Manganese in levels above those specified.

Emission Source/Control: FILT3 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: FILT4 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: FILT5 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: BLAST - Process

Emission Source/Control: HWELD - Process

Emission Source/Control: PLASM - Process

Emission Source/Control: VPLAS - Process

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