

Facility DEC ID: 6301300237

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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 6-3013-00237/00008  
Effective Date: 01/15/2021 Expiration Date: 01/14/2031

Permit Issued To: Strategic Global Aviation LLC  
394 Hangar Rd  
Rome, NY 13441

Contact: John D Hester  
394 Hangar Rd Bldg 101  
Rome, NY 13441  
(607) 483-1689

Facility: Strategic Global Aviation  
394 HANGAR RD - BLDG 101  
ROME, NY 13441

Contact: John D Hester  
394 Hangar Rd Bldg 101  
Rome, NY 13441  
(607) 483-1689

Description:

This project consists of the development of a new Air State Facility Permit for Strategic Global Aviation LLC. This facility is engaged in the maintenance, repair and overhaul (MRO) of military aircraft. The Standard Industrial Classification representative of this facility is 4581 (Airports, Flying Fields & Services) and 3721 (Aircraft). The primary source of air emissions originates from the the depainting and repainting (surface coating) of military aircraft. This facility will also operate two 4 million BTU/hr boilers. With respect to air pollution regulation, the emissions of concern at Strategic Global Aviation are VOC, HAP, NOx, CO, and particulate matter. Strategic Global Aviation has elected to cap VOC and HAP below the Major Source Threshold for the purpose of avoiding a Title V Air Permit. This facility will be subject to 40 CFR 63 -Subpart HHHHHH and also 40 CFR 63-Subpart JJJJJ.

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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:           TERRY R TYOE  
                                          NYSDEC - UTICA SUBOFFICE  
                                          207 GENESEE ST  
                                          UTICA, NY 13501-2885

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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- 5 4 Permit modifications, suspensions or revocations by the Department

**Facility Level**

- 5 5 Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA

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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.

**Condition 4: Permit modifications, suspensions or revocations by the Department**

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**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 6  
SUBOFFICE - UTICA**

**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 6 Sub-office  
Division of Environmental Permits  
State Office Building, 207 Genesee Street  
Utica, NY 13501-2885  
(315) 793-2555

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

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: Strategic Global Aviation LLC  
394 Hangar Rd  
Rome, NY 13441

Facility: Strategic Global Aviation  
394 HANGAR RD - BLDG 101  
ROME, NY 13441

Authorized Activity By Standard Industrial Classification Code:  
4581 - AIRPORTS, FLYING FIELDS, AND SERVICES  
3721 - AIRCRAFT

Permit Effective Date: 01/15/2021

Permit Expiration Date: 01/14/2031

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- 7 1 6 NYCRR 201-6.4 (a) (1) (ii): Compliance Demonstration
- 8 2 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- 8 \*3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 10 \*4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 12 5 6 NYCRR 211.2: Visible Emissions Limited
- 12 6 6 NYCRR 212-1.5 (g): Compliance Demonstration
- 13 7 6 NYCRR 212-1.5 (g): Compliance Demonstration
- 15 8 6 NYCRR 212-1.5 (g): Compliance Demonstration
- 16 9 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 17 10 6 NYCRR 225-1.2 (f): Compliance Demonstration
- 18 11 6 NYCRR 227-1.3 (a): Compliance Demonstration
- 19 12 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 21 13 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 22 14 40CFR 63.11173(a), Subpart HHHHHH: Compliance Demonstration
- 23 15 40CFR 63.11173(e)(2), Subpart HHHHHH: General requirements
- 24 16 40CFR 63.11173(e)(3), Subpart HHHHHH: HVLP Spray Gun Requirement
- 25 17 40CFR 63.11173(e)(4), Subpart HHHHHH: Spray Gun Cleaning
- 25 18 40CFR 63.11173(f)(2), Subpart HHHHHH: Compliance Demonstration
- 26 19 40CFR 63.11223(d), Subpart JJJJJJ: Compliance Demonstration

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- 27 20 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

**EU=1-BTH01,Proc=PB1**

- 27 21 40CFR 63.11173(e)(1), Subpart HHHHHH: Certification for painters

**EU=2-BAY61,Proc=B6S**

- 28 22 40CFR 63.11173(e)(1), Subpart HHHHHH: Certification for painters

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- 30 23 ECL 19-0301: Contaminant List
- 31 24 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 32 25 6 NYCRR Subpart 201-5: Emission Unit Definition
- 32 26 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 33 27 6 NYCRR 201-5.3 (c): CLCPA Applicability
- 33 28 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 33 29 6 NYCRR 211.1: Air pollution prohibited
- 34 30 6 NYCRR 211.1: Compliance Demonstration
- 34 31 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 35 32 6 NYCRR 212-2.3 (b): Compliance Demonstration

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- 37 33 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 38 34 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



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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.

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**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

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

**Item I: Required Emission Tests - 6 NYCRR 202-1.1**

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

**Item J: Open Fires Prohibitions - 6 NYCRR 215.2**

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

**Item K: Permit Exclusion - ECL 19-0305**

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to

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emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (a) (1) (ii)**

**Item 1.1:**

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

Emission Unit: 2-BAY61

Regulated Contaminant(s):

CAS No: 0NY998-00-0	VOC
CAS No: 0NY100-00-0	TOTAL HAP

**Item 1.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall maintain records of chemical paint stripper usage. No DRE is expected. Each Annual Monitoring Report shall include a stand-alone page that includes a table that quantifies the following information:

- 1) The 12 month rolling total (twelve monthly entries) of the volume of paint stripper that had been used
- 2) The 12 month rolling total of VOC emitted from that volume of stripper. Facility should assume 100% of VOC that was in the formulation had been eluted unless credible evidence indicates otherwise.
- 3) The 12 month rolling total of HAP emitted from that volume of stripper. Facility should assume 100% of HAP that was in the formulation had been eluted unless credible evidence indicates otherwise.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

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Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2021.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 2: Facility Permissible Emissions**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 2.1:**

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: 0NY100-00-0	PTE: 45,000 pounds per year
Name: TOTAL HAP	
CAS No: 0NY998-00-0	PTE: 90,000 pounds per year
Name: VOC	

**Condition 3: Capping Monitoring Condition**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**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)
- 6 NYCRR Subpart 228-1
- 6 NYCRR 231-2.2 (b) (1)
- 40 CFR Part 63, Subpart GG

**Item 3.2:**

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

**Item 3.3:**

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

**Item 3.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This

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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: 0NY998-00-0      VOC

**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:

CAP:

Facility owner shall ensure that the facility-wide emissions of volatile organic compounds (VOC), including those from permitted, exempt and trivial sources, remain less than 90,000 pounds during any consecutive 365 day period. This 90,000 pound VOC cap is sufficiently high so as to avoid the requirements of Part 228-1, therefore Strategic Global Aviation is not subject to the VOC-content limitations of Table E (Aerospace), but Strategic Global is subject to the General Requirements of 228-1.3. VOCs are solvents that originate in liquid phase; VOCs shall be assumed to be eluted to the atmosphere at 100% of the in-the-can mass.

RECORDS:

Facility owner shall maintain records that verify the facility's monthly VOC emissions. These records shall be maintained at the facility for a minimum five year period. Reports will be submitted annually, in a format acceptable to the Department, which document that the facility's VOC emissions during any consecutive 365 day period were less than 90,000 pounds.

REPORTS:

The annual monitoring report shall include information that documents the VOC emissions from each emission source at the facility, including exempt and trivial activities. The report shall also include all emission factors and other data used in calculating the monthly VOC emissions. The form "Annual Capping Certification" is required.

NONCOMPLIANCE:

Any noncompliance with the VOC emission limit in this

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condition must be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: VOC  
Upper Permit Limit: 90,000 pounds per year  
Reference Test Method: EPA Reference Method 25A  
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 1/30/2021.  
Subsequent reports are due every 12 calendar month(s).

**Condition 4: Capping Monitoring Condition**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**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)  
40 CFR Part 63, Subpart GG

**Item 4.2:**

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

**Item 4.3:**

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

**Item 4.4:**

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

**Item 4.5:**

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

**Item 4.6:**

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

Emission Unit: 1-BTH01

Emission Unit: 2-BAY61

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

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

CAP:

Facility owner shall ensure that the facility-wide emissions of hazardous air pollutants, totalled collectively (aggregated HAP), including those from permitted, exempt and trivial sources, remain less than 45,000 pounds during any consecutive 365 day period. For the purposes of this permit, many HAPs will be solvents that originate in liquid phase and they will assumed to be eluted into the atmosphere at 100% of the in-the-can mass. Only HAPs that are believed to be particulates (some metal compounds) may be reduced (DRE) by transfer efficiency, fall out and filter capture efficiency. The facility shall be clear on this point.

RECORDS:

Facility owner shall maintain records that verify the facility's monthly aggregated HAP emissions. These records shall be maintained at the facility for a minimum five year period. Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's aggregated HAP emissions during any consecutive 365 day period were less than 45,000 pounds.

REPORTS:

The Annual Monitoring Report shall include information that documents the aggregated HAP emissions from each emission source at the facility, including exempt and trivial activities. The report shall also include all emission factors and other data used in calculating the monthly HAP emissions. The form "Annual Capping Certification" is required.

NONCOMPLIANCE:

Any noncompliance with the HAP emission limit in this condition must be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: TOTAL HAP



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Upper Permit Limit: 45,000 pounds per year  
 Reference Test Method: EPA Reference Method 24  
 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 1/30/2021.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 5: Visible Emissions Limited**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**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 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement:6 NYCRR 212-1.5 (g)**

**Item 6.1:**

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

Emission Unit: 2-BAY61 Process: B62	Emission Source: S6F01
Emission Unit: 2-BAY61 Process: B62	Emission Source: S6F07
Emission Unit: 2-BAY61 Process: B62	Emission Source: S6F10
Emission Unit: 2-BAY61 Process: B62	Emission Source: S6FO4
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F01
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F07
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F10
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6FO4

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

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

**FIRST STAGE:**

Source owner shall operate and maintain the 1st stage paint booth filters (an array of 1st stage filters, one array in each of the four filter banks) within the manufacturer's recommended (or empirical evidence) pressure drop range, as referenced below. Magnehelic readings shall be monitored and logged once per day whenever the paint booth is in operation. Instances of deviation shall require root cause analysis including, but not limited to, filter inspection or filter replacement.

Note: Fabric filiters shall be assumed to capture only solid and liquid particles. Further, liquids particles could be volatile and very possibly could volatilize after capture and therefore then become released into the atmosphere. Calculations of paint fall out, paint transfer efficiency and filter capture efficiency are the domain of particulate emissions, not vapors and possibly not liquids. With respect to this discussion, Strategic Global Aviation shall excercise caution when calculating DRE.

Parameter Monitored: PRESSURE DROP  
 Lower Permit Limit: 0.03 inches of water  
 Upper Permit Limit: 0.75 inches of water  
 Monitoring Frequency: DAILY  
 Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2021.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 7: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement:6 NYCRR 212-1.5 (g)**

**Item 7.1:**

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

Emission Unit: 2-BAY61  
 Process: B62  
 Emission Source: S6F02

Permit ID: 6-3013-00237/00008

Facility DEC ID: 6301300237

Emission Unit: 2-BAY61 Process: B62	Emission Source: S6F08
Emission Unit: 2-BAY61 Process: B62	Emission Source: S6F11
Emission Unit: 2-BAY61 Process: B62	Emission Source: S6FO5
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F02
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F08
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F11
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6FO5
Regulated Contaminant(s): CAS No: 0NY075-00-0	PARTICULATES

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

SECOND STAGE:

Source owner shall operate and maintain the 2nd stage paint booth filters (an array of 2nd stage filters, one array in each of the four filter banks) within the manufacturer's recommended (or empirical evidence) pressure drop range, as referenced below. Magnehelic readings shall be monitored and logged once per day whenever the paint booth is in operation. Instances of deviation shall require root cause analysis including, but not limited to, filter inspection or filter replacement.

Note: Fabric filiters shall be assumed to capture only solid and liquid particles. Further, liquids particles could be volatile and very possibly could volatilize after capture and therefore then become released into the atmosphere. Calculations of paint fall out, paint transfer efficiency and filter capture efficiency are the domain of particulate emissions, not vapors and possibly not liquids. With respect to this discussion, Strategic Global Aviation shall excercise caution when calculating DRE.

Parameter Monitored: PRESSURE DROP

Permit ID: 6-3013-00237/00008

Facility DEC ID: 6301300237

Lower Permit Limit: 0.01 inches of water  
 Upper Permit Limit: 0.2 inches of water  
 Monitoring Frequency: DAILY  
 Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2021.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement: 6 NYCRR 212-1.5 (g)**

**Item 8.1:**

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

Emission Unit: 2-BAY61 Process: B62	Emission Source: S6F03
Emission Unit: 2-BAY61 Process: B62	Emission Source: S6F06
Emission Unit: 2-BAY61 Process: B62	Emission Source: S6F09
Emission Unit: 2-BAY61 Process: B62	Emission Source: S6F12
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F03
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F06
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F09
Emission Unit: 2-BAY61 Process: B6S	Emission Source: S6F12
Regulated Contaminant(s): CAS No: 0NY075-00-0	PARTICULATES

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:  
 THIRD STAGE:

Permit ID: 6-3013-00237/00008

Facility DEC ID: 6301300237

Source owner shall operate and maintain the 3rd stage paint booth filters (an array of 3rd stage filters, one array in each of the four filter banks) within the manufacturer's recommended (or empirical evidence) pressure drop range, as referenced below. Magnehelic readings shall be monitored and logged once per day whenever the paint booth is in operation. Instances of deviation shall require root cause analysis including, but not limited to, filter inspection or filter replacement.

Note: Fabric filters shall be assumed to capture only solid and liquid particles. Further, liquids particles could be volatile and very possibly could volatilize after capture and therefore then become released into the atmosphere. Calculations of paint fall out, paint transfer efficiency and filter capture efficiency are the domain of particulate emissions, not vapors and possibly not liquids. With respect to this discussion, Strategic Global Aviation shall exercise caution when calculating DRE.

Parameter Monitored: PRESSURE DROP  
 Lower Permit Limit: 0.10 inches of water  
 Upper Permit Limit: 1.17 inches of water  
 Monitoring Frequency: DAILY  
 Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2021.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 9.1:**

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

Emission Unit: 1-BTH01	Emission Point: PSB01
Emission Unit: 1-BTH01	Emission Point: PSB02
Emission Unit: 1-BTH01	Emission Point: PSB3A
Emission Unit: 1-BTH01	Emission Point: PSB3B
Emission Unit: 1-BTH01	Emission Point: PSB3C
Emission Unit: 1-BTH01	Emission Point: PSB3D
Emission Unit: 2-BAY61	Emission Point: EPH61

Permit ID: 6-3013-00237/00008

Facility DEC ID: 6301300237

Emission Unit: 2-BAY61

Emission Point: EPH62

Regulated Contaminant(s):

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

**Item 9.2:**

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

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 10: Compliance Demonstration**

**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement:6 NYCRR 225-1.2 (f)**

**Item 10.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 2-BAY61

Process: BLR

Emission Source: BOIL1

Permit ID: 6-3013-00237/00008

Facility DEC ID: 6301300237

Emission Unit: 2-BAY61

Process: BLR

Emission Source: BOIL2

Regulated Contaminant(s):

CAS No: 007446-09-5

SULFUR DIOXIDE

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of commercial, industrial, or residential emission sources that fire number two heating oil on or after July 1, 2012 are limited to the purchase of number two heating oil with 0.0015 percent sulfur by weight or less (15 ppm). Compliance with this limit shall be based on vendor certifications.

Data collected pursuant to this Subpart shall be tabulated and summarized in a form acceptable to the Department, and shall be retained for at least five years. Facility owners or distributors shall submit these records and summaries upon the request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NUMBER 2 HEATING OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 15 parts per million by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

**Condition 11: Compliance Demonstration**

**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)**

**Item 11.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 2-BAY61

Emission Point: BOILS

Regulated Contaminant(s):

CAS No: 0NY075-00-0

PARTICULATES

**Item 11.2:**

Permit ID: 6-3013-00237/00008

Facility DEC ID: 6301300237

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (based on a six minute average), except for one 6 minute period per hour of not more than 27 percent opacity. The applicant will conduct a Method 9 test if requested by NYSDEC. A report of the results of the test will be submitted to the Department within 30 days of the completion of a Method 9 test. All records generated by the permittee will be maintained at the facility for a minimum of five years.

If #2 distillate oil is fired, then the permittee shall conduct one weekly observation of visible emissions from the boiler stack while the boiler is in operation. Facility shall maintain a log of such observations and be in a position to expediently produce it to NYSDEC staff. Such records shall be retained for a minimum five-year period.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: EPA RM9 when requested by NYSDEC  
Monitoring Frequency: When firing distillate fuel oil  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2021.  
Subsequent reports are due every 12 calendar month(s).

**Condition 12: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 12.1:**

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

Emission Unit: 1-BTH01	Emission Point: PSB01
Emission Unit: 1-BTH01	Emission Point: PSB02
Emission Unit: 2-BAY61	Emission Point: EPH61
Emission Unit: 2-BAY61	Emission Point: EPH62

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



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**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

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

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

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

Incident 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

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acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Observe plume weekly, perform RM 9 at DEC request

Monitoring Frequency: WEEKLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 13.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 13.2:**

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

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- 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 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: WEEKLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2021.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 14: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

Permit ID: 6-3013-00237/00008

Facility DEC ID: 6301300237

**Item 14.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000075-09-2      DICHLOROMETHANE

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each paint stripping operation that meets the qualifications for an affected source under 40 CFR 63, subpart HHHHHH, the facility must implement management practices to minimize the evaporative emissions of methylene chloride. The management practices must address, at a minimum, the practices listed below:

- 1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).
- 2) Evaluate each application where a paint stripper containing methylene chloride is used to ensure that there is no alternative paint stripping technology that can be used.
- 3) Reduce exposure of all paint strippers containing methylene chloride to the atmosphere.
- 4) Optimize application conditions when using paint strippers containing methylene chloride to reduce methylene chloride evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low a possible to reduce evaporation).
- 5) Practice proper storage and disposal of paint strippers containing methylene chloride (e.g., store stripper in closed, air-tight containers).

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

**Condition 15:      General requirements**

**Effective between the dates of 01/15/2021 and 01/14/2031**

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

Permit ID: 6-3013-00237/00008

Facility DEC ID: 6301300237

**Item 15.1:**

This Condition applies to:

Emission Unit: 1BTH01  
Process: PB1Emission Unit: 2BAY61  
Process: B62**Item 15.2:**

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 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 16: HVLP Spray Gun Requirement**  
**Effective between the dates of 01/15/2021 and 01/14/2031****Applicable Federal Requirement: 40CFR 63.11173(e)(3), Subpart HHHHHH****Item 16.1:**

All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent

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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. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District’s “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002” The requirements of this condition do not apply to painting performed by students and instructors at paint training centers. The requirements of this condition do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

**Condition 17: Spray Gun Cleaning**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 17.1:**

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.

**Condition 18: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement:40CFR 63.11173(f)(2), Subpart HHHHHH**

**Item 18.1:**

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

Emission Unit: 1-BTH01  
 Process: PB1

Emission Unit: 2-BAY61  
 Process: B62

Regulated Contaminant(s):

CAS No: 010294-40-3	CHROMIC ACID, BARIUM SALT
CAS No: 010588-01-9	CHROMIC ACID DISODIUM SALT
CAS No: 013423-61-5	MAGNESIUM CHROMATE
CAS No: 007789-06-2	STRONTIUM CHROMATE

**Item 18.2:**

Compliance Demonstration shall include the following monitoring:

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Facility DEC ID: 6301300237

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Painter Training - Minimum Curriculum Requirements:

Hands-on and classroom instruction that addresses, at a minimum - initial and refresher training in the topics below.

(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 the fluid delivery rate.

Monitoring Frequency: MINIMUM - ONCE PER CALENDAR YEAR

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 19: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement: 40CFR 63.11223(d), Subpart JJJJJ**

**Item 19.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 2-BAY61

Process: BLR

Emission Source: BOIL1

Emission Unit: 2-BAY61

Process: BLR

Emission Source: BOIL2

**Item 19.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Seasonal boilers must conduct a tune-up every 5 years as specified in 40 CFR 63.11223(b)(1) through (7). Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed seasonal boiler, the first 5-year tune-up must be no later than 61 months after the initial startup. The owner or operator may delay the burner inspection specified in 40 CFR 63.11223(b)(1) and inspection of the system controlling the air-to-fuel ratio specified in 40 CFR 63.11223(b)(3) until the next scheduled unit shutdown, but he/she must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. Seasonal boilers are not subject to the emission limits in Table 1 to subpart JJJJJ or the operating limits in Table 3 to

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subpart JJJJJ.

Monitoring Frequency: Once every five years  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2021.  
 Subsequent reports are due every 12 calendar month(s).

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

**Condition 20: Emission Unit Permissible Emissions**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 20.1:**

The sum of emissions from all regulated processes specified in this permit for the emission unit cited

shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 2-BAY61

CAS No: 0NY100-00-0

Name: TOTAL HAP

PTE(s): 0.667 pounds per hour

5,847 pounds per year

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 2.68 pounds per hour

23,442 pounds per year

**Condition 21: Certification for painters**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 21.1:**

This Condition applies to Emission Unit: 1-BTH01  
 Process: PB1

**Item 21.2:**

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.



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**Condition 22: Certification for painters**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 22.1:**

This Condition applies to Emission Unit: 2-BAY61  
Process: B6S

**Item 22.2:**

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.

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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 by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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required to comply with the request within sixty working days of written notification by the Department.

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 23: Contaminant List**

**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable State Requirement:ECL 19-0301**

**Item 23.1:**

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

CAS No: 000075-09-2

Name: DICHLOROMETHANE

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 007789-06-2

Name: STRONTIUM CHROMATE

CAS No: 010294-40-3

Name: CHROMIC ACID, BARIUM SALT

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CAS No: 010588-01-9  
Name: CHROMIC ACID DISODIUM SALT

CAS No: 013423-61-5  
Name: MAGNESIUM CHROMATE

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

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

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

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

**Condition 24: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 24.1:**

- (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.

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(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 25: Emission Unit Definition**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 25.1:**

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

Emission Unit: 1-BTH01

Emission Unit Description:

This emission unit consists of painting or de-painting operations on aircraft parts and sub-assemblies only in any of two walk-in paint booths (PTSB1 & PTSB2). Sanding operations are performed in a third walk in spray booth (PTSB3). All three of these booths are located in the low shop area. This work may be performed only while the exhaust fans for that particular booth are in operation. Filter maintenance is required.

Building(s): 101

**Item 25.2:**

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

Emission Unit: 2-BAY61

Emission Unit Description:

This emission unit consists of the painting or de-painting of partial or entire aircraft only in Hangar #6. These operations may only occur while four fans (for the four filter banks) are operating and when enough doors are closed, or openings sealed so as to ensure that air is perceptibly being pulled into the hangar. Emission point EPH61 is southmost and EPH62 is northmost.

Building(s): 101

**Condition 26: Renewal deadlines for state facility permits**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 26.1:**

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.

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**Condition 27: CLCPA Applicability**  
Effective between the dates of 01/15/2021 and 01/14/2031

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

**Item 27.1:**

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 28: Compliance Demonstration**  
Effective between the dates of 01/15/2021 and 01/14/2031

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

**Item 28.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 28.2:**

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 6  
State Office Building  
317 Washington Ave.  
Watertown, NY 13601

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

**Condition 29: Air pollution prohibited**  
Effective between the dates of 01/15/2021 and 01/14/2031

**Applicable State Requirement:6 NYCRR 211.1**

**Item 29.1:**

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,

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pollen, toxic or deleterious emission, either alone or in combination with others.

**Condition 30: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 30.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

- CAS No: 0NY075-00-0 PARTICULATES
- CAS No: 0NY100-00-0 TOTAL HAP
- CAS No: 0NY998-00-0 VOC

**Item 30.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:
1. Have a complaint phone line available 24 hours a day, 7 days a week; the employment of an answering machine is acceptable.
  2. Investigate any possible causes of any complaint received.
  3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
  4. Fully document the complaint, results of investigation, and action taken.
  5. Annually, report in a format acceptable to the Department. Facility shall report the number of complaints (even if zero) that have been logged throughout the reporting period

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

**Condition 31: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable State Requirement:6 NYCRR 212-2.1 (a)**

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**Item 31.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007789-06-2	STRONTIUM CHROMATE
CAS No: 010294-40-3	CHROMIC ACID, BARIUM SALT
CAS No: 013423-61-5	MAGNESIUM CHROMATE
CAS No: 010588-01-9	CHROMIC ACID DISODIUM SALT

**Item 31.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Part 212 HTAC Analysis has been performed - no further control is required.

The contaminants listed above contain the reference compound Cr6. Chromium-6 compounds are on the 6 NYCRR 212-2.2 Table 2 HTAC list. Facility projects the following pre-control actual emissions: Calcium dichromate (014307336) @ 139.7 lb/yr, sodium dichromate anhydrate (010588019) @ 11.9 lb/yr, strontium chromate (007789062) @ 801.5 lb/yr, barium chromate (010294403) @ 24.2 lb/yr and magnesium chromate (013423615) @ 44.6 lb/yr all of which total @ 1021.9 lb/yr. Spray booth filters are required to have 98% DRE + transfer efficiency + fallout factor, all of this totals to 99.99% DRE, yielding estimated annual Chromium-6 compound emissions of 0.04 lb/yr. Given that 0.04 lb/yr is less than the Table 2 mass emission limit of 0.1 lb/yr, no further control is required for chromium-6 compounds.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 32: Compliance Demonstration**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

**Applicable State Requirement:6 NYCRR 212-2.3 (b)**

**Item 32.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-BTH01  
 Process: PB1

Emission Unit: 1-BTH01  
 Process: SND

Emission Unit: 2-BAY61



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Process: B62

Emission Unit: 2-BAY61

Process: B6S

Regulated Contaminant(s):

CAS No: 010588-01-9	CHROMIC ACID DISODIUM SALT
CAS No: 013423-61-5	MAGNESIUM CHROMATE
CAS No: 007789-06-2	STRONTIUM CHROMATE

**Item 32.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Particulate emissions of CHROMIUM-6 COMPOUNDS:

For any and all A-rated (high toxicity) non-criteria air contaminants whose emission rate potential (ERP) is between 1 and 10 lbs/hr, Strategic Global Aviation shall achieve ongoing destruction/removal efficiency (DRE) of no less than 99%. The above list of compounds have been known to reside in Strategic's aircraft coatings and this list shall not be considered to be inclusive of contaminants that should be considered. Any A-rated compound that might be in a manufacturer's coating specification will become implicated. Facility shall ensure that at least 99% DRE is accomplished while the affected coatings are being applied. Facility shall maintain ongoing and expeditious readiness to verify this DRE to Department staff.

Each Annual Monitoring Report (ANN) shall include information that verifies that facility has continued to maintain compliance with this requirement. Each ANN shall itemize the method by which the DRE was determined for each spray booth in which any A-rated toxic compound had been applied.

This 99% destruction and removal efficiency (DRE) is the primary core underpinning of another permit Condition 6 NYCRR 212-2.1(a) and therefore is essential.

This requirement is facility-wide and therefore encompasses (not inclusive) coating operations, paint-stripping operations and sanding operations.

See Table 4 in 6 NYCRR 212-2.3(b) Table 4 for Regulatory directive.

Parameter Monitored: CAPTURE EFFICIENCY

Lower Permit Limit: 99 percent capture efficiency

Reference Test Method: Calculate DRE for filters in each spray booth

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Monitoring Frequency: CONTINUOUS  
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
 VALUE AT ANY TIME  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2021.  
 Subsequent reports are due every 12 calendar month(s).

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

**Condition 33: Emission Point Definition By Emission Unit**  
 Effective between the dates of 01/15/2021 and 01/14/2031

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

**Item 33.1:**

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

- Emission Unit: 1-BTH01
  - Emission Point: PSB01
    - Height (ft.): 54 Diameter (in.): 34
    - NYTMN (km.): 4786.013 NYTME (km.): 466.607 Building: 101
  - Emission Point: PSB02
    - Height (ft.): 54 Diameter (in.): 36
    - NYTMN (km.): 4786.013 NYTME (km.): 466.607 Building: 101
  - Emission Point: PSB3A
    - Height (ft.): 55 Diameter (in.): 33
    - NYTMN (km.): 4786.013 NYTME (km.): 466.607 Building: 101
  - Emission Point: PSB3B
    - Height (ft.): 55 Diameter (in.): 33
    - NYTMN (km.): 4786.013 NYTME (km.): 466.607 Building: 101
  - Emission Point: PSB3C
    - Height (ft.): 55 Diameter (in.): 33
    - NYTMN (km.): 4786.013 NYTME (km.): 466.607 Building: 101
  - Emission Point: PSB3D
    - Height (ft.): 55 Diameter (in.): 33
    - NYTMN (km.): 4786.013 NYTME (km.): 466.607 Building: 101

**Item 33.2:**

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

- Emission Unit: 2-BAY61
  - Emission Point: BOILS
    - Height (ft.): 50 Diameter (in.): 20

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NYTMN (km.): 4786.013    NYTME (km.): 466.607    Building: 101

Emission Point: EPH61

Height (ft.): 96    Diameter (in.): 67  
 NYTMN (km.): 4786.013    NYTME (km.): 466.607    Building: 101

Emission Point: EPH62

Height (ft.): 96    Diameter (in.): 67  
 NYTMN (km.): 4786.013    NYTME (km.): 466.607    Building: 101

**Condition 34:    Process Definition By Emission Unit**  
**Effective between the dates of 01/15/2021 and 01/14/2031**

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

**Item 34.1:**

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

Emission Unit: 1-BTH01

Process: PB1    Source Classification Code: 4-02-025-11

Process Description:

This Process consists of the spray paint coating of aircraft parts or aircraft sub-assemblies; and such painting shall occur only in any one of two walk-in spray booths PTSB1 & PTSB2.

The filters in spray booths PTSB1 and PTSB2 are required to be certified for Subpart HHHHHH - compliant particulate HAP capture. These filters require maintenance. VOC and some HAP constituents in coatings that are applied in these walk-in booths shall be conservatively considered to be 100% released into the atmosphere. The solid particulate fraction of sprayed coatings are available for DRE reduction. Emissions calculations shall follow this plan.

Emission Source/Control: PBFF1 - Control  
 Control Type: FABRIC FILTER

Emission Source/Control: PBFF2 - Control  
 Control Type: FABRIC FILTER

Emission Source/Control: PTSB1 - Process

Emission Source/Control: PTSB2 - Process

**Item 34.2:**

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

Emission Unit: 1-BTH01

Process: SND    Source Classification Code: 4-02-024-02

Process Description:

This Process consists of the sanding (surface coating

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pretreatment) of aircraft fuselage parts in walk-in booth #3, which is located in the inner shop area. Such sanding will generate particulate emissions.

Emission Source/Control: PBFF3 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: PTSB3 - Process

**Item 34.3:**

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

Emission Unit: 2-BAY61

Process: B62

Source Classification Code: 4-02-024-99

Process Description:

Process B62 consists of the re-painting of partial or entire aircraft in Hangar #6. Coatings shall ONLY be applied while the four filter bank fans are operating. Enough hangar doors shall be kept closed, or openings sealed so as to ensure that make-up air is always moving, in a perceptible manner, INTO the hangar. Three-stage PM filters shall be installed, maintained and monitored.

NOTE: A distinction shall be made between gaseous and particulate VOC & HAP emissions specifically when calculating the painting emissions generated in Hangar #6. Most VOC & HAP emissions will be gaseous and a conservative 100% product content release (per MSDS/TDS info) to the atmosphere is to be assumed. Filters cannot be expected to capture these gases. Metal HAP constituents including chromium, lead, manganese, nickel and cadmium generate as PM emissions, which are believed to undergo a 99% capture (1% release) on certified triple-filter systems.

Emission Source/Control: S6F01 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F02 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F03 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F06 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F07 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F08 - Control  
Control Type: FABRIC FILTER

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Emission Source/Control: S6F09 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F10 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F11 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F12 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6FO4 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6FO5 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: BANK1 - Process

Emission Source/Control: BANK2 - Process

Emission Source/Control: BANK3 - Process

Emission Source/Control: BANK4 - Process

**Item 34.4:**

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

Emission Unit: 2-BAY61

Process: B6S

Source Classification Code: 6-82-400-30

Process Description:

This process consists of the chemical depainting of either partial or entire aircraft. Process B6S paint stripping shall be performed only in Hangar #6, which has been configured as both a spray booth/maintenance bay. Stripper shall ONLY be applied while the four filter bank fans are operating. Enough hangar doors shall be kept closed, or openings sealed so as to ensure that make-up air is always moving, in a perceptible manner, INTO the hangar. Three-stage filters shall be installed, maintained and monitored. VOC and HAP emissions (emissions are assumed to be gaseous - assume 100% product content release) shall be recorded using MSDS or TDS information. VOC and HAP emissions from strippers shall be regulated by Part 212 and calculated per stripper volume used. Stripper shall be applied by either spray gun or brush.

Emission Source/Control: S6F01 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F02 - Control

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Control Type: FABRIC FILTER

Emission Source/Control: S6F03 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F06 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F07 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F08 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F09 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F10 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F11 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6F12 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6FO4 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S6FO5 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: BANK1 - Process

Emission Source/Control: BANK2 - Process

Emission Source/Control: BANK3 - Process

Emission Source/Control: BANK4 - Process

**Item 34.5:**

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

Emission Unit: 2-BAY61

Process: BLR

Source Classification Code: 1-02-005-03

Process Description:

This Process consists of the operation of two Cleaver Brooks 4 MMBtu seasonal boilers. These units fire natural gas as their primary fuel and they are configured to fire #2 distillate fuel oil as a back up fuel. Boilers generate steam to heat the make-up air system during spring and fall period when the Griffiss Central Steam Station is shut down. An exhaust duct from each boiler (two boilers -

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collectively two ducts) then combine into one 20" duct which goes through a sidewall and then orients vertically (where the high shop area adjoins to Bay 6) to a point that is 6' above the roofline.

Emission Source/Control: BOIL1 - Combustion  
Design Capacity: 4 million Btu per hour

Emission Source/Control: BOIL2 - Combustion  
Design Capacity: 4 million Btu per hour

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