



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-1802-00016/00015
Effective Date: 04/09/2015 Expiration Date: 04/08/2025

Permit Issued To: GRAHAM CORPORATION
20 FLORENCE AVE
BATAVIA, NY 14020

Contact: KIMBERLY DENTON
GRAHAM CORP
20 FLORENCE AVE
BATAVIA, NY 14020
(585) 343-2216

Facility: GRAHAM CORPORATION
20 FLORENCE AVE
BATAVIA, NY 14020

Description:

Air State Facility Permit to replace an Air Facility Registration for the Graham Corporation Batavia Facility, which manufactures vacuum, pumping, and heat transfer equipment for industrial processes and the energy production industry. Potential emissions above Title V thresholds in 6NYCRR Part 201-6, actual emissions that may exceed the Significant Mass Emission Rates for Persistent, Bioaccumulative and Toxic Compounds in Part 201-9, and variances from the requirements of Part 228-1 Surface Coating Processes, require a Permit to replace the Air Facility Registration.

This Permit includes conditions specifying limits on coating materials, use of alternate compliant coatings, and coating equipment maintenance and monitoring, sufficient to restrict facility emissions to below Title V thresholds of 50 tons per year of volatile organic compounds (VOC), 10 tons per year of any individual hazardous air pollutant (HAP) compound, and 25 tons per year of all HAP compound emissions combined.

This Permit also includes variances from the requirements of 6NYCRR Part 228 Surface Coating Processes. Graham Corporation provided information to justify a variance from Part 228-1.4 Requirements for controlling VOC emissions using compliant materials based on technical infeasibility, and a variance from Part 228-1.5 Requirements for controlling VOC emissions using add-on controls or coating systems based on economic infeasibility. The Department accepted the process, equipment, and cost information submitted as sufficient to establish that non-compliant coatings are currently required for the coating operations involved, and that the cost of add-on VOC controls would exceed the Department's cost guidelines per ton of emissions controlled.

New York State Department of Environmental Conservation
Facility DEC ID: 8180200016



This Permit requires Graham Corporation to maintain monthly records of coating, chemical, and solvent use and resultant emissions on site for a minimum of five years, with records made available with all supporting data to Department inspectors upon request.

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: SCOTT SHEELEY
 NYSDEC - REGION 8
 6274 E AVON-LIMA RD
 AVON, NY 14414

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for 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
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 8 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 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

New York State Department of Environmental Conservation

Permit ID: 8-1802-00016/00015

Facility DEC ID: 8180200016



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: GRAHAM CORPORATION
20 FLORENCE AVE
BATAVIA, NY 14020

Facility: GRAHAM CORPORATION
20 FLORENCE AVE
BATAVIA, NY 14020

Authorized Activity By Standard Industrial Classification Code:
3443 - FABRICATED PLATE WORK (BOILER SHOPS)
3561 - PUMPS AND PUMPING EQUIPMENT
3569 - GEN INDUSTRIAL MACHINERY, NEC

Permit Effective Date: 04/09/2015

Permit Expiration Date: 04/08/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 215.2: Open Fires - Prohibitions
- 3 6 NYCRR 200.7: Maintenance of Equipment
- 4 6 NYCRR 201-7.1: Facility Permissible Emissions
- *5 6 NYCRR 201-7.1: Capping Monitoring Condition
- *6 6 NYCRR 201-7.1: Capping Monitoring Condition
- 7 6 NYCRR 211.1: Air pollution prohibited
- 8 6 NYCRR 212.3 (a): Emissions from existing sources
- 9 6 NYCRR 212.3 (b): Compliance Demonstration
- 10 6 NYCRR 212.6 (a): Compliance Demonstration
- 11 40CFR 63.11516(a), Subpart XXXXXX: Compliance Demonstration
- 12 40CFR 63.11516(b), Subpart XXXXXX: Compliance Demonstration
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- 15 40CFR 63.11517(c), Subpart XXXXXX: Visual determination of emissions opacity for welding Tier 2 or 3, general
- 16 40CFR 63.11517(d), Subpart XXXXXX: Compliance Demonstration
- 17 40CFR 63.11519(a), Subpart XXXXXX: Compliance Demonstration
- 18 40CFR 63.11519(b), Subpart XXXXXX: Compliance Demonstration
- 19 40CFR 63.11519(c), Subpart XXXXXX: Compliance Demonstration

Emission Unit Level

EU=U-00004,Proc=400

- 20 6 NYCRR 200.7: Compliance Demonstration
- 21 6 NYCRR 228-1.1: Compliance Demonstration
- 22 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 23 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 24 6 NYCRR 228-1.3 (b) (2): Compliance Demonstration
- 25 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 26 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 27 6 NYCRR 228-1.4 (b) (4) (i): Compliance Demonstration
- 28 6 NYCRR 228-1.4 (b) (4) (ii): Compliance Demonstration
- 29 6 NYCRR 228-1.6 (a): Compliance Demonstration
- 30 6 NYCRR 228-1.6 (c): Surface coating access for sampling
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EU=U-00005,Proc=500

- 32 6 NYCRR 227-1.3 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

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- 33 ECL 19-0301: Contaminant List
- 34 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 35 6 NYCRR Subpart 201-5: Emission Unit Definition
- 36 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 37 6 NYCRR 201-5.3 (c): Compliance Demonstration



38 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

39 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit

40 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;
- (3) During the period of the emergency the facility owner and/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 and/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 and/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 F: 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 G: 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 H: 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 I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

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

Item J: 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 K: 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 L: 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 M: 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 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: Acceptable Ambient Air Quality



Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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.

Condition 2: Open Fires - Prohibitions
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 215.2

Item 2.1:

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

Item 2.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit



toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

Condition 3: Maintenance of Equipment
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 200.7

Item 3.1:

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

Condition 4: Facility Permissible Emissions
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 4.1:

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: 47,500 pounds per year
Name: TOTAL HAP

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

Condition 5: Capping Monitoring Condition
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 5.1:

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



Item 5.2:

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

Item 5.3:

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 5.4:

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 5.5:

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 5.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Individual HAP emissions shall not exceed 10 tons per year, and aggregate HAP emissions 23.75 tons per year on a twelve month rolling basis. HAP emissions for natural gas combustion sources will be calculated using the emission factor of 1.88# of total HAPS/ million standard cubic feet of natural gas fired (AP-42 Table 1.4-3). HAP emissions from coatings, thinners, chemicals, and other sources will be totaled using material balance calculations. These records must be submitted to the Department on an annual basis in a format acceptable to the Department.

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Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 6: Capping Monitoring Condition
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 6.1:

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

Item 6.2:

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

Item 6.3:

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 6.4:

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 6.5:

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 6.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 6.7:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

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Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility's total VOC emissions shall not exceed 45 tons per year based on a twelve month total rolled monthly. VOC emissions for natural gas combustion sources will be calculated using the emission factor of 5.5# of total VOCs / million standard cubic feet of natural gas fired (AP-42 Table 1.4-2). VOC emissions from coatings, thinners, chemicals, and other sources will be totaled using material balance calculations. These records must be submitted to the Department on an annual basis in a format acceptable to the Department.

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 7: Air pollution prohibited
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 7.1:

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 8: Emissions from existing sources
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 212.3 (a)

Item 8.1:

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 9: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 212.3 (b)

Item 9.1:

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The Compliance Demonstration activity will be performed for the Facility.

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

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.15 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA Method 5

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.



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

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

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 dry abrasive blasting affected source which consists of an abrasive blasting chamber that is totally enclosed and unvented, as defined in §63.11522, or a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, the facility must comply with the following applicable requirements and implement the following management practices to minimize emissions of metal fabrication HAPs (MFHAPs):

1-The facility must capture emissions from a vented dry abrasive blasting operation and vent them to a filtration control device. The facility must operate the filtration control device according to manufacturer's instruction,



and must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified in §63.11519(c)(4); and

2-The facility must minimize dust generation during emptying of abrasive enclosures and

3-The facility must enclose dusty abrasive material storage areas and holding bins, seal chutes, and conveyors that transport abrasive materials

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

5-The facility must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

Subsequent reports are due every 6 calendar month(s).

Condition 12: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility that owns or operates a machining affected source must implement management practices to minimize emissions of metal fabrication HAP (MFHAP) as specified

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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.

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 1/30/2016.

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

Condition 13: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For all welding operations which use metal fabrication HAPs (MFHAP) as defined in §63.11522, the facility must comply with the requirements listed in §63.11516(f)(1) and (2).

If the welding operations at the facility use at least 2000 pounds per year, calculated on a 12-month total, rolled monthly, of welding rods which contain one or more of the metal fabrication HAPs, then the facility must demonstrate that management practices or fume control measures are being implemented by complying with the requirements listed in §63.11516(f)(3)-(8).

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:40CFR 63.11517(a), Subpart XXXXXX

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Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. The facility owner/operator must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.

Parameter Monitored: OPACITY

Upper Permit Limit: 0 percent

Reference Test Method: EPA Method 22

Monitoring Frequency: WHEN THE SOURCE IS OPERATING

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Visual determination of emissions opacity for welding Tier 2 or 3, general

Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:40CFR 63.11517(c), Subpart XXXXXX

Item 15.1:

Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

Condition 16: Compliance Demonstration

Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:40CFR 63.11517(d), Subpart XXXXXX

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Visual determination of emissions opacity for welding



Tier 2 or 3, graduated schedule. You must perform visual determination of emissions opacity in accordance with paragraph (c) of this section and according to the schedule in paragraphs (d)(1) through (5) of this section.

(1) Daily Method 9 testing for welding, Tier 2 or 3. Perform visual determination of emissions opacity once per day during each day that the process is in operation.

(2) Weekly Method 9 testing for welding, Tier 2 or 3. If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (d)(1) of this section does not exceed 20 percent for 10 days of operation of the process, you may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, you must resume testing every day of operation of the process according to the requirements of paragraph (d)(1) of this section.

(3) Monthly Method 9 testing for welding Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(2) of this section does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, you must resume testing every five days of operation of the process according to the requirements of paragraph (d)(2) of this section.

(4) Quarterly Method 9 testing for welding Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent for three consecutive monthly tests, you may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, you must resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (d)(3) of this section.

(5) Return to Method 22 testing for welding, Tier 2 or 3. If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the

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monthly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent, you may resume EPA Method 22 testing as in paragraphs (b)(3) and (4) of this section. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with paragraphs (d)(3) and (4) of this section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any existing facility subject to the requirements of 40 CFR 63, subpart XXXXXX shall submit a Notification of Compliance Status by November 22, 2011 which contains the information listed in §63.11519(a)(2)(i)-(iv).

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 18: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 18.2:

Compliance Demonstration shall include the following monitoring:

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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 1/30/2016.

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

Condition 19: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 19.2:

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: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 20: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 200.7

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004

Process: 400

Regulated Contaminant(s):

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CAS No: ONY075-00-5 PM-10

Item 20.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility will limit PM-10 emissions by maintaining the spray booth panel filters in accordance with manufacturer's instructions and monitoring and recording on a daily basis, when the equipment is operational, the differential pressure gauge drop across the individual filters. Differential pressure gauge drop must be maintained within manufacturer's specifications during spray booth operations. These records must be submitted to the Department upon request in a format acceptable to the Department.

Work Practice Type: DAYS PER YEAR OPERATION

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 0.9 inches of water

Upper Permit Limit: 2.0 inches of water

Monitoring Frequency: DAILY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration

Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 228-1.1

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004

Process: 400

Regulated Contaminant(s):

CAS No: ONY998-00-0 VOC

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Graham Corporation coating line operations must be in compliance with the provisions of this Subpart, effective on or before June 6, 2013. As outlined in the facility's 'VOC RACT Analysis' submission the following provisions must be met:



- 1) Transition to approved alternative coatings must be completed by December 31, 2015; further
- 2) all testing of alternative coatings must be completed by March 31, 2015,
- 3) all contractual commitments currently requiring the use of non-compliant coatings must be completed by June 30, 2015, and
- 4) written reports outlining progress/status must be submitted to the Department, and are due on June 30, 2015 and December 31, 2015.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 22: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004

Process: 400

Item 22.2:

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

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- 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

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 23: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 23.1:

The Compliance Demonstration activity will be performed for:

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Emission Unit: U-00004
Process: 400

Item 23.2:

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

Condition 24: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (2)

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004
Process: 400



Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners and operators of emission sources not subject to 6 NYCRR Part 228-1, as set forth in Paragraphs 228-1.1(b)(9) or (13), or those sources that are using coatings not subject to specific requirements of Part 228-1 as set forth in Paragraph 228-1.3(e)(2), or Clauses 228-1.4(b)(5)(iii)(e), 228-1.4(b)(5)(iii)(i) or 228-1.4(b)(5)(iv), must maintain records on an as used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. If the exemption criteria are based on VOC usage, the records must contain calculations and supplier/manufacturer material data sheets for verification of VOC usage. All records required by this Paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 25: Surface Coating- Prohibitions
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 25.1:

This Condition applies to Emission Unit: U-00004
Process: 400

Item 25.2:

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;



(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Condition 26: Surface Coating - Handling, storage and disposal
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 26.1:

This Condition applies to Emission Unit: U-00004
Process: 400

Item 26.2:

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

(1) 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;

(2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(4) 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;

(5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(6) minimize spills during the handling and transfer of coatings and VOC solvents; and

(7) clean hand held spray guns by one of the following:

(i) an enclosed spray gun cleaning system that is kept closed when not in use;

(ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

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(iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Condition 27: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004
Process: 400

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

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility applying miscellaneous metal parts coatings must use an application technique as specified in the following list: (i) flow/curtain coating; (ii) dip coating; (iii) cotton-tipped swab application; (iv) electro-deposition coating; (v) high volume low pressure spraying; (vi) electrostatic spray; (vii) airless spray, (including air assisted); (viii) airbrush application methods for stenciling, lettering, and other identification markings; or (ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

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 1/30/2016.

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

Condition 28: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025



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

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004
Process: 400

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

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility applying miscellaneous metal parts coatings may not use coatings with VOC contents, as applied, which exceed 3.5 pounds VOC / per gallon or limits categorically specified in table B4. The facility must specify the use of baked or air dried for the purpose of compliance and recordkeeping. All units in table B4 are in terms of weight (kilograms or pounds) of VOC per volume (liters or gallons) of coating (minus water and excluded compounds) at application.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 29: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 228-1.6 (a)

Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004
Process: 400

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating

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by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 30: Surface coating access for sampling
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 228-1.6 (c)

Item 30.1:

This Condition applies to Emission Unit: U-00004
Process: 400

Item 30.2:

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

Condition 31: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable Federal Requirement:6 NYCRR 228-1.6 (h)

Item 31.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004
Process: 400

Item 31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be



reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 32: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025

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

Item 32.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00005
Process: 500

Item 32.2:

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 (six minute average), except for one-six-minute period per hour of not more than 27 percent opacity. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

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

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective

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actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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

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

Item B: 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 33: Contaminant List
Effective between the dates of 04/09/2015 and 04/08/2025



Applicable State Requirement:ECL 19-0301

Item 33.1:

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

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

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

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

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

Condition 34: Malfunctions and start-up/shutdown activities
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable State Requirement:6 NYCRR 201-1.4

Item 34.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described



under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 35: Emission Unit Definition
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 35.1:

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

Emission Unit: U-00001

Emission Unit Description:

This emission unit consists of the collection of exempt CNC milling machines located in Buildings 3 and 5. Emissions, including oil mist, are vented inside the facility. No emission points are associated with this unit- exempt under 6NYCRR 200.1 (f).

Building(s): 3
5

Item 35.2:

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

Emission Unit: U-00002

Emission Unit Description:

This emission unit includes two submerged metal arc welding machines. Emissions from the welding process are vented inside the building, exempt under 6NYCRR 200.1 (f), and minimized by the use of wall mounted Clark Air units, which are packaged HEPA air filters.

Building(s): 5

Item 35.3:

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

Emission Unit: U-00003

Emission Unit Description:

This emission unit includes two plasma arc cutting tables. Emissions from the cutting process are vented inside the building, exempt under 6NYCRR 200.1 (f), and minimized by the use of wall mounted Clark Air Units, which are packaged HEPA air filters.

Building(s): 5

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Item 35.4:

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

Emission Unit: U-00004

Emission Unit Description:

This emission unit includes the facility's three spray paint booths. The booths are equipped with panel filters, for particulate control, and dedicated exhaust stacks. Source 403 is equipped with two stacks. Filter performance is monitored using differential pressure gauges mounted on each booth.

Building(s): 3
5
8

Item 35.5:

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

Emission Unit: U-00005

Emission Unit Description:

This emission unit includes two natural gas fired steam boilers. One of the boilers has a heat input rating of 20.9 million Btus/hr and the other has a rating of 12.6 million Btus/hr.

Building(s): OLD PLANT
R&D

Item 35.6:

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

Emission Unit: U-00006

Emission Unit Description:

This unit consists of a number of various abrasive cleaning, degreasing, manual welding, machining, a paint mixing area, and miscellaneous operations that are exempt from permitting regulations.

**Condition 36: Renewal deadlines for state facility permits
Effective between the dates of 04/09/2015 and 04/08/2025**

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

Item 36.1:

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 37: Compliance Demonstration
Effective between the dates of 04/09/2015 and 04/08/2025**

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

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Item 37.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 37.2:

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 8
6274 East Avon-Lima Rd.
Avon, NY 14414

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 38: Visible Emissions Limited
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable State Requirement:6 NYCRR 211.2

Item 38.1:

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.

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

Condition 39: Emission Point Definition By Emission Unit
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 39.1:

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

Emission Unit: U-00004

Emission Point: EP005

Height (ft.): 35

Diameter (in.): 34

NYTMN (km.): 4764.933

NYTME (km.): 241.874

Building: 3

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Emission Point: EP006
Height (ft.): 28 Diameter (in.): 20
NYTMN (km.): 4764.933 NYTME (km.): 241.874 Building: 5

Emission Point: EP007
Height (ft.): 33 Diameter (in.): 36
NYTMN (km.): 4764.933 NYTME (km.): 241.874 Building: 8

Item 39.2:

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

Emission Unit: U-00005

Emission Point: EP008
Height (ft.): 33 Diameter (in.): 4
NYTMN (km.): 4764.933 NYTME (km.): 241.874 Building: R&D

Emission Point: EP009
Height (ft.): 33 Diameter (in.): 4
NYTMN (km.): 4764.933 NYTME (km.): 241.874 Building: OLD PLANT

Condition 40: Process Definition By Emission Unit
Effective between the dates of 04/09/2015 and 04/08/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 40.1:

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

Emission Unit: U-00001
Process: 100 Source Classification Code: 3-09-030-04
Process Description:

This process is computer numerical controlled (CNC) machining of carbon and stainless steel using any of the facilities automated mills and turning machines. Emission are controlled using mist collectors and wall mounted Clark Air units which are packaged HEPA filters. No emission points are associated with this unit- exempt under 6NYCRR 200.1 (f).

Emission Source/Control: 00102 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 00103 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 00101 - Process

Item 40.2:

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

Emission Unit: U-00002



Process: 200 Source Classification Code: 3-09-005-01

Process Description:

This process is mechanized welding using either of the facility's two submerged metal arc welders. Exempt under 6NYCRR 200.1 (f), emissions from the welding process are vented inside the building, and minimized by the use of wall mounted Clark Air units, which are packaged HEPA air filters.

Emission Source/Control: 00203 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 00201 - Process

Emission Source/Control: 00202 - Process

Item 40.3:

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

Emission Unit: U-00003

Process: 300 Source Classification Code: 4-02-001-01

Process Description:

This process is plasma arc cutting of carbon and stainless steel materials. Exempt under 6NYCRR 200.1 (f), emissions are vented inside the facility and minimized by the use of wall mounted Clark Air units, which are packaged HEPA filters .

Emission Source/Control: 00303 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 00301 - Process

Emission Source/Control: 00302 - Process

Item 40.4:

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

Emission Unit: U-00004

Process: 400 Source Classification Code: 3-08-999-99

Process Description:

This process is the application of primer and paint to miscellaneous metal parts and equipment in any of the facility's three spray booths. Paint and primer are applied using HVLP spray guns. The booths include panel filters for particulate matter control.

Emission Source/Control: 0402A - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: 0403A - Control
Control Type: FIBERGLASS FILTER

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Emission Source/Control: 0404A - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00402 - Process

Emission Source/Control: 00403 - Process

Emission Source/Control: 00404 - Process

Item 40.5:

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

Emission Unit: U-00005

Process: 500

Source Classification Code: 1-02-006-02

Process Description:

This process is natural gas combustion in either of two steam boilers.

Emission Source/Control: 00501 - Combustion

Design Capacity: 20.9 million BTUs per hour

Emission Source/Control: 00502 - Combustion

Design Capacity: 12.6 million BTUs per hour

Item 40.6:

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

Emission Unit: U-00006

Process: 600

Process Description:

Various processes associated with exempt operations including manual welding, manual machining, metal degreasing, abrasive metal cleaning; a paint mixing, transfer, and storage area, etc.

Emission Source/Control: 00601 - Process

