

Facility DEC ID: 9060800039

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-0608-00039/02001

Effective Date: 05/24/2016 Expiration Date: 05/23/2026

Permit Issued To:HOPE'S WINDOWS INC

84 HOPKINS AVE

JAMESTOWN, NY 14701-2223

Contact: DANIEL LAUSTERER

HOPE'S WINDOWS INC 84 HOPKINS AVE JAMESTOWN, NY 14701

Facility: HOPE'S WINDOWS INC

84 HOPKINS AVE

JAMESTOWN, NY 14701

Contact: DANIEL LAUSTERER

HOPE'S WINDOWS INC 84 HOPKINS AVE

JAMESTOWN, NY 14701

Description:

- (1) Hope's Windows Inc. is located at 84 Hopkins Ave., Jamestown, New York. The facility manufactures quality windows for a variety of applications including high end architectural, commercial, residential, and prison.
- (2) This renewal permit includes three emission units: Emission Unit U-11111 consists of welding and fabrication sources for the construction of steel window frames. Emission Unit U-22222 consists of the surface coating sources including 4 paint booths, a primary bake oven, and a paint vault/mixing area associated with the wet paint operation. Also included is one powder coating booth and associated batch oven. Emission Unit U-33333 is comprised of the heat/combustion sources at the facility. These sources include a natural gas fired boiler, natural gas fired make-up air unit, and 36 natural gas fired space heaters.
- (3) The facility's actual and potential emissions of all air contaminants are less than 50% of the major source thresholds.



- (4) In March 2002, the air emissions from the facility had the potential to exceed 10 tons per year (tpy) methyl ethyl ketone (MEK) and greater than 25 tpy total Hazardous Air Pollutants (HAP). As such, the initial Air State Facility permit contained federally enforceable permit conditions limiting HAP emissions to 22.5 tpy and limiting emissions of MEK to 9.5 tpy.
- (5) Today, the facility has reduced total and individual HAP emissions below 50 percent of the major source thresholds. As such, the permit no longer contains federally enforceable permit conditions limiting the HAP emissions. However, the facility should maintain records of the actual volatile organic compound (VOC) and HAP emissions to document the continued reduction of emissions below the major source thresholds. The records should be maintained on-site and made available for review upon request.
- (6) The permit includes VOC RACT Coating limits for a Class B Miscellaneous Metal Parts coating line. The coating category for the process is identified as a Baked High Performance Architectural application. In accordance with Table B4 of 6 NYCRR Subpart 228-1.4(b)(4), the coating VOC limit for these coatings is 6.2 pounds of VOC per gallon of coating (minus water and excluded compounds) at application.
- (7) An adhesive operation is used to bond metal to metal during the assembly of doors. In accordance with 6NYCRR Part 228-2, Table 1 for "Architectural Sealants", the corresponding VOC content limit is 250 grams per liter (g/l), as-applied. Compliance with this limit is demonstrated through a Method 24 analysis.
- (8) As per 6NYCRR Part 228-2.4(b)(1), all surface preparation solvents used with adhesive operations shall have a VOC concentration less than 70 g/l.
- (9) As per 6NYCRR Part 228-2.4(b)(3), all cleaning solvents used with adhesive operations shall have a composite vapor pressure less than 45 mm Hg at 20°C.
- (10) The renewal application must be submitted to the department at least 180 days, but not more than 18 months, prior to the date of permit expiration. While the renewal application is being processed by the department, the owner or operator of the facility may continue to operate under the terms and conditions of the existing permit, provided the application is submitted in accordance with 6NYCRR Part 201-5.2(c).



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:	LISA M CZECHOWICZ			
	NYSDEC - REGION 9			
	270 MICHIGAN AVE			
	BUFFALO, NY 14203-2915			
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.



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 9 HEADQUARTERS

Facility DEC ID: 9060800039

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 renewal application at least 180 days before expiration of permits for both 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 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 9 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 9 Headquarters Division of Environmental Permits 270 Michigan Avenue Buffalo, NY 14203-2915 (716) 851-7165



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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:HOPE'S WINDOWS INC 84 HOPKINS AVE JAMESTOWN, NY 14701-2223

Facility: HOPE'S WINDOWS INC

84 HOPKINS AVE

JAMESTOWN, NY 14701

Authorized Activity By Standard Industrial Classification Code:

3442 - METAL DOORS, SASH, AND TRIM

Permit Effective Date: 05/24/2016 Permit Expiration Date: 05/23/2026



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LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 2 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

EU=U-11111

- 3 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 4 6 NYCRR 212-2.4 (b): Compliance Demonstration

EU=U-22222

- 5 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 6 6 NYCRR 228-1.3 (b) (2): Compliance Demonstration
- 7 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 8 6 NYCRR 228-1.3 (d): Surface Coating Handling, storage and disposal
- 9 6 NYCRR 228-1.3 (e): Surface Coating- application requirements
- 10 6 NYCRR 228-1.3 (e) (2): Compliance Demonstration
- 11 6 NYCRR 228-1.4 (b): Compliance Demonstration
- 12 6 NYCRR 228-1.6 (a): Compliance Demonstration
- 13 6 NYCRR 228-1.6 (c): Surface coating access for sampling
- 14 6 NYCRR 228-1.6 (h): Compliance Demonstration
- 15 6 NYCRR 228-2.4 (a): Compliance Demonstration
- 16 6 NYCRR 228-2.4 (b) (1): Compliance Demonstration
- 17 6 NYCRR 228-2.4 (b) (3): Compliance Demonstration
- 18 6 NYCRR 228-2.4 (b) (4): Compliance Demonstration
- 19 6 NYCRR 228-2.4 (d): Compliance Demonstration
- 20 6 NYCRR 228-2.5 (a): Compliance Demonstration
- 21 6 NYCRR 228-2.5 (c): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS Facility Level

- 22 ECL 19-0301: Contaminant List
- 23 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 24 6 NYCRR Subpart 201-5: Emission Unit Definition
- 25 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 26 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 27 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

28 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit



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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,

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required to operate such device effectively.

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

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

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

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

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

Item H: Proof of Eligibility for Sources Defined as Trivial

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Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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



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

FEDERAL APPLICABLE REQUIREMENTS The following conditions are federally enforceable.

Condition 1: Non Applicable requirements

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable Federal Requirement: 6 NYCRR 201-6.4 (g)

Item 1.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

40 CFR Part 63, Subpart JJJJJJ

Reason: The natural gas fired combustion units are exempt from this regulation.

40 CFR Part 63, Subpart XXXXXX

Reason: The primary SIC for the facility is 3442 which is not applicable to the nine source categories of 40CFR63 Subpart XXXXXX – NESHAP for Metal fabrication and Finishing Source Categories.

40 CFR Part 63, Subpart ZZZZ

Reason: There are no emergency generaotrs or fire pumps at this facility.

Condition 2: Air pollution prohibited

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable Federal Requirement: 6 NYCRR 211.1

Item 2.1:

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

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prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

**** Emission Unit Level ****

Condition 3: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-11111

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

WELDING AND FABRICATION SOURCES PARTICULATE MATTER (PM) OPACITY LIMIT

- (1) As required by 6NYCRR Part 212-1.6(a), 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.
- (2) Compliance with this requirement shall be determined by the facility owner/operator conducting a routine survey of visible emissions when a process is in operation. If any visible emissions are identified, corrective action is required.
- (3) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Reference Test Method: EPA Method 9



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-11111

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

WELDING AND FABRICATION SOURCES PARTICULATE MATTER (PM) EMISSION LIMIT

The control of particulate emissions generated from the welding and fabrication sources are restricted as follows:

- (1) As required by 6NYCRR Part 212-2.4(b)(1), emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).
- (2) The owner/operator shall operate and maintain each dust collection system in accordance with manufacturer recommendations.
- (3) On-going compliance monitoring of the particulate emissions are required as follows:
- (a) Routine visible emission observations and inspection of any fall-out from the process and/or dust collector(s) shall be completed when a process is in operation.
- (b) Routine differential pressure measurements of the dust collector(s) shall be completed when a process is in normal operation.



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- (c) Differential pressure shall be measured between the inlet and outlet to the dust collector(s). The dust collector(s) shall be operated within the differential pressure range specified by the manufacturer.
- (d) The differential pressure transducer(s) shall be calibrated annually or as required by the manufacturer.
- (e) If any visible emissions, particulate fall-out or pressure measurement is recorded outside the manufacturer range, then the owner/operator shall inspect the source, initiate corrective action, and restore operation of the dust collector and associated capture system to its normal operation as expeditiously as practicable.
- (4) Records shall be maintained to include: (i) maintenance records, (ii) a log documenting the date and time when any visible emissions or fall-out were observed, (iii) a description of the corrective action taken (if any), and (iv) the cause of the visible emissions, fall-out or pressure measurements outside the manufacturer range (if known). The records shall be kept on-site and be made available to the Department upon request.
- (5) Compliance testing shall be conducted at the request of the Department.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.05 grains per dscf Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Item 5.2:

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

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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 6: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Item 6.2:

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



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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 7: Surface Coating- Prohibitions

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 7.1:

This Condition applies to Emission Unit: U-22222

Item 7.2:

Renewal 1

- (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.



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Condition 8: Surface Coating - Handling, storage and disposal

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 8.1:

This Condition applies to Emission Unit: U-22222

Item 8.2:

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;
- (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 9: Surface Coating- application requirements

Effective between the dates of 05/24/2016 and 05/23/2026

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



Permit ID: 9-0608-00039/02001 Facility DEC ID: 9060800039

Item 9.1:

This Condition applies to Emission Unit: U-22222

Item 9.2:

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

- (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.

Condition 10: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

55 GALLON NON- COMPLIANT COATING LIMIT



Permit ID: 9-0608-00039/02001 Facility DEC ID: 9060800039

This facility may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4 of this Subpart; provided such use is recorded in accordance with the requirements of paragraph 228-1.3(b)(2) of this section.

Parameter Monitored: COATING

Upper Permit Limit: 55 gallons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -

SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

OPERATIONS

Monitoring Description:

SURFACE COATING VOC RACT COMPLIANCE

- (1) The facility operates a Class B Miscellaneous Metal Parts coating line. The coating category for the process is identified as a Baked High Performance Architectural application.
- (2) In accordance with Table B4 of 6 NYCRR Subpart 228-1.4(b)(4), the coating VOC limit for these coatings is 6.2 pounds of VOC per gallon of coating (minus water and excluded compounds) at application.
- (3) Sampling and testing of any coating to confirm VOC content compliance must be performed in a manor directed by and at the request of the Department.



Permit ID: 9-0608-00039/02001 Facility DEC ID: 9060800039

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT Upper Permit Limit: 6.2 pounds per gallon Reference Test Method: EPA Method 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL

CHANGE

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -

SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Item 12.2:

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 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 13: Surface coating access for sampling

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 13.1:



Permit ID: 9-0608-00039/02001 Facility DEC ID: 9060800039

This Condition applies to Emission Unit: U-22222

Item 13.2:

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 14: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Item 14.2:

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 15: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable Federal Requirement: 6 NYCRR 228-2.4 (a)

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

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OPERATIONS

Monitoring Description:

ARCHITECTURAL SEALANT ADHESIVE VOC LIMITS

- (1) An adhesive operation is used to bond metal to metal during the assembly of doors. In accordance with 6NYCRR Part 228-2, Table 1 for "Architectural Sealants", the corresponding VOC content limit is 250 grams per liter (g/l), as-applied. Compliance with this limit is demonstrated through a Method 24 analysis.
- (2) A Method 24 analysis on the "as-applied" product must be provided from an Environmental Laboratory Approval Program (ELAP) certified laboratory.
- (3) The projected use of any new products in this process must demonstrate compliance with Subpart 228 and satisfy any applicable permit modification requirements prior to use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: ADHESIVE

Parameter Monitored: VOC CONTENT Upper Permit Limit: 250 grams per liter Reference Test Method: EPA Method 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL

CHANGE

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 16: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (1)

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

OPERATIONS

Monitoring Description:

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ADHESIVE OPERATION SURFACE PREPARATION SOLVENTS VOC CONTENT LIMIT

- (1) The concentration of volatile organic compound (VOC) in all surface preparation solvents used with adhesive operations shall be less than 70 grams per liter.
- (2) A Method 24 analysis on the "as-applied" product must be provided from an Environmental Laboratory Approval Program (ELAP) certified laboratory.
- (3) The projected use of any new surface preparation solvent in this process must demonstrate compliance with Subpart 228 and satisfy any applicable permit modification requirements prior to use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: CLEANING MATERIAL Parameter Monitored: VOC CONTENT Upper Permit Limit: 70 grams per liter Reference Test Method: EPA Method 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL

CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY

TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 17: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable Federal Requirement:6 NYCRR 228-2.4 (b) (3)

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

OPERATIONS

Monitoring Description:

ADHESIVE OPERATIONS CLEANUP SOLVENT LIMIT



Permit ID: 9-0608-00039/02001 Facility DEC ID: 9060800039

- (1) The composite vapor pressure in all cleanup solvents used with adhesive operations shall be less than 45 mm Hg at 20° C.
- (2) The composite vapor pressure of organic compounds in cleaning materials shall be determined by quantifying the amount of each compound in the blend using gas chromatographic analysis ASTM E 260-96 (2006) for organics and ASTM D3792-05 for water content, as applicable, and following the equation in 6NYCRR Part 228-2.6(e).
- (3) The projected use of any new surface preparation solvent in this process must demonstrate compliance with Subpart 228 and satisfy any applicable permit modification requirements prior to use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: CLEANING MATERIAL

Parameter Monitored: COMPOSITE VAPOR PRESSURE

Upper Permit Limit: 45 millimeters of mercury

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL

CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY

TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 18: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (4)

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

When performing the removal of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment, the facility owner or operator must:

1. use an enclosed cleaning system, or an equivalent

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cleaning system as determined by the applicable test method identified in 6 NYCRR Part 228-2.6(h);

- 2. use a solvent with a VOC content less than or equal to 70 grams per liter; and
- 3. soak all parts containing dried adhesive in a solvent with a composite vapor pressure, excluding water and exempt compounds, less than or equal to 9.5 mm Hg at 20 degrees Celsius. The solvent and any soaking parts must be kept in a closed container at all times except when adding or removing parts from the container.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: VOC CONTENT Upper Permit Limit: 70 grams per liter

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable Federal Requirement: 6 NYCRR 228-2.4 (d)

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Work practices shall be employed at facilities where the total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed three tons in a 12-month rolling period, before consideration of emission control equipment. Work practices shall include:

(1) the following types of application equipment, with the use of low-VOC adhesives or adhesive primers: electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods

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similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to Department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;

- (2) the following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive-related waste materials that:
- (i) store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers;
- (ii) ensure that mixing and storage containers used for VOC-containing adhesives, adhesive primers, and process related waste materials are kept closed at all times except when depositing or removing these materials;
- (iii) minimize spills of VOC-containing adhesives, adhesive primers, and process related waste materials; and
- (iv) convey VOC-containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes.
- (3) the following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:
- (i) store all VOC-containing cleaning materials and used shop towels in closed containers;
- (ii) ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing these materials;
- (iii) minimize spills of VOC-containing cleaning materials:
- (iv) convey VOC-containing cleaning materials from one location to another in closed containers or pipes;and
- (v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that



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equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable Federal Requirement: 6 NYCRR 228-2.5 (a)

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Facilities using products subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall maintain records demonstrating compliance with the VOC content limits, including, but not limited to, the following information:

- (1) a list of each commercial and industrial adhesive, sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the facility;
- (2) identification of each product by product name and description;
- (3) the VOC content of each product as supplied;
- (4) the mix ratio of any catalysts, reducers or other components used;
- (5) the final VOC content or vapor pressure, as applied; and
- (6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the



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facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable Federal Requirement: 6 NYCRR 228-2.5 (c)

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-22222

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records made to determine compliance with Subpart 228-2 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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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.



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Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS The following conditions are state only enforceable.

Condition 22: Contaminant List

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable State Requirement: ECL 19-0301

Item 22.1:

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: 0NY998-00-0

Name: VOC

Condition 23: Malfunctions and start-up/shutdown activities

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable State Requirement: 6 NYCRR 201-1.4

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Item 23.1:

- (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 24: Emission Unit Definition

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 24.1:

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

Emission Unit: U-11111

Emission Unit Description:

Emission Unit U-11111 consists of welding and fabrication sources for the construction of steel window frames.

Building(s): 1



Permit ID: 9-0608-00039/02001 Facility DEC ID: 9060800039

2

Item 24.2:

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

Emission Unit: U-22222 Emission Unit Description:

Emission Unit U-22222 consists of the surface coating sources including 4 paint booths, a primary bake oven, and a paint vault/mixing area associated with the wet paint operation. Also included is one powder coating booth and associated batch oven.

Building(s): 3

Item 24.3:

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

Emission Unit: U-33333 Emission Unit Description:

Emission Unit U-33333 is comprised of the heat/combustion sources at the facility. These sources include a natural gas fired boiler, natural gas fired make-up air unit, and 36 natural gas fired space heaters.

Building(s): 2

3

4

5

Condition 25: Renewal deadlines for state facility permits

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 25.1:

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 26: Compliance Demonstration

Effective between the dates of 05/24/2016 and 05/23/2026

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

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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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 9 270 Michigan Ave. Buffalo, NY 14203

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27: Visible Emissions Limited

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable State Requirement: 6 NYCRR 211.2

Item 27.1:

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 28: Emission Point Definition By Emission Unit

Effective between the dates of 05/24/2016 and 05/23/2026

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 28.1:

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

Emission Unit: U-11111

Emission Point: 00102

Height (ft.): 18 Length (in.): 44 Width (in.): 18 NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 2

Emission Point: 00103

Height (ft.): 18 Length (in.): 32 Width (in.): 18 NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 1

Emission Point: 00104

Height (ft.): 9 Length (in.): 32 Width (in.): 32

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 2

Emission Point: 00105

Height (ft.): 4 Length (in.): 90 Width (in.): 36

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Permit ID: 9-0608-00039/02001 Facility DEC ID: 9060800039

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 00107

Height (ft.): 21 Diameter (in.): 14

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Item 28.2:

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

Emission Unit: U-22222

Emission Point: 00201

Height (ft.): 43 Diameter (in.): 42

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 00202

Height (ft.): 43 Diameter (in.): 42

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 00203

Height (ft.): 43 Diameter (in.): 42

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 00204

Height (ft.): 43 Diameter (in.): 42

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 00205

Height (ft.): 43 Diameter (in.): 36

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 00207

Height (ft.): 43 Diameter (in.): 42

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 00208

Height (ft.): 23 Diameter (in.): 18

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 0206A

Height (ft.): 26 Diameter (in.): 24

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 0206B

Height (ft.): 27 Diameter (in.): 24

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 0206C

Height (ft.): 43 Diameter (in.): 32

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Emission Point: 0206D



Permit ID: 9-0608-00039/02001 Facility DEC ID: 9060800039

Height (ft.): 28 Diameter (in.): 24

NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3

Item 28.3:

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

Emission Unit: U-33333

Emission Point: 00302

Height (ft.): 35 Length (in.): 80 Width (in.): 80 NYTMN (km.): 4670.4 NYTME (km.): 151.4 Building: 3



New York State Department of Environmental Conservation Permit ID: 9-0608-00039/02001 Facility DEC ID: 9060800039