

Facility DEC ID: 9063800066

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-0638-00066/02003
Effective Date: 06/17/2019 Expiration Date: 06/16/2029

Permit Issued To:SKF USA INC
890 FORTY FOOT RD
PO BOX 352
LANSDALE, PA 19446-0352

Contact: JON H STEVENS
SKF USA INC
890 FORTY FOOT RD PO BOX 352
LANSDALE, PA 19446

Facility: SKF AEROENGINE NORTH AMERICA
ONE MAROCO RD
FALCONER, NY 14733-0263

Contact: Larry Tyers
SKF Aeroengine NA
PO Box 263
Falconer, NY 14733-0263
(716) 661-2279

Description:

(1) SKF Aeroengine is a manufacturer of specialized ball and roller bearings for the aerospace industry. The facility is located at One Maroco Road, Falconer, New York.

(2) This permit action is being completed to change the permit type from a Title V permit to an Air State Facility permit. This permit change can be completed because the facility potential emissions have been reduced below major source thresholds due to the removal of emission sources, process modifications and business changes.

(3) The facility completed a 6 NYCRR Part 212-2 evaluation for all process emission sources at the facility. The Part 212-2 evaluation included total facility emissions of criteria pollutants (specifically PM10 and PM2.5), a high toxicity contaminant (HTAC, specifically chromium), and non-HTACs emitted at a rate greater than 100 lbs/yr facility-wide. The evaluation demonstrated the facility process operations satisfy the requirements of Part 212. The details of the evaluation are summarized in the Part 212-2.3 permit conditions for each process.

(4) Emission points EP135 and EP221 were re-evaluated for the Reasonably Available Control Technology (RACT) requirements for Volatile Organic Compound (VOC) emissions at Major Facilities, as required under 6 NYCRR Part 212-3(e). This section states any facility subject to VOC RACT will remain subject to these provisions even if the annual potential to emit VOCs later fall below the applicability threshold. SKF demonstrated in the updated VOC RACT analysis that an overall removal efficiency of 81% could not be met due to reasons of both technological and economic feasibility. The original VOC RACT analysis also concluded that the

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overall removal efficiency of 81% could not be met due to reasons of both technological and economic feasibility. Therefore, VOC RACT controls are not required for these sources. The department approved a variance from VOC RACT when the initial Title V permit was issued on January 9, 2006. The Department has re-approved and submitted the variance to the USEPA as a source specific revision to the State Implementation Plan. Emission point 221 has since been removed from the facility operations. Emission point EP135 was also analyzed under 6 NYCRR Part 212-2 to ensure emissions from this source comply with the emission requirements specified in 6 NYCRR Part 212-2.3, Table 4.

(5) The facility has removed the emission sources and emission points associated with Process 01C. Process 01C included a Magnaflux Dip Tank (DT45) and Parts Washer (PW12) which vented through emission point EP221. These two emission sources were removed from the facility in the year 2010. Emission point EP221 was subsequently capped.

(6) The facility has removed the emission sources and emission points associated with Process 004. Process 004 was the Black Oxide process, which consisted of five (5) process tanks that vented through EP136. All five (5) tanks for this process were removed and EP136 was capped in July 2018.

(7) The facility operates cold cleaning degreasers that are listed as exempt or trivial activities in 6 NYCRR Part 201-3. This means these sources are exempt from the permitting provisions of Subpart 201-5 and are not required to be listed in the permit. However, this does not mean that these activities are exempted from other applicable requirements. As such, unless these sources are specifically exempt from the solvent metal cleaning regulation under 6 NYCRR Part 226.6, then these sources must comply with the requirements of Part 226, where applicable.

(8) The facility operates two (2) conveyORIZED parts washers that are listed as exempt sources under 6 NYCRR Part 201-3.2(c)(39)(iii) and 6 NYCRR Part 226.6(a)(1), conveyORIZED degreasers with an air/vapor interface smaller than 22 square feet.

(9) SKF Aeroengine is not subject to 40 CFR 63 Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. The facility is primarily engaged in manufacturing associated with a SIC code of 3562 and a NAICS code of 332991 which are not applicable categories for the NESHAP.

(10) SKF Aeroengine is not subject to 40 CFR 63 Subpart WWWWWW – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations. SKF Aeroengine does not operate a dry mechanical polishing operation subject to this rule. Process 06A does not include polishing of finished metals or formed products after plating.

(11) SKF Aeroengine does not operate any stationary combustion installations that are subject to 6 NYCRR Part 227.

(12) SKF Aeroengine does not operate any Stationary Reciprocating Internal Combustion Engines (RICE) that are subject to the RICE NESHAP or the RICE New Source Performance Standards.

(13) The renewal application for this Air State Facility Permit must be submitted to the department at least 180 days, but not more than 18 months, prior to the date of permit

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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: MARK F PASSUITE
 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.

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

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:
 The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
 The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
 A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:
 Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:
 The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
 The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3
 Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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

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Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 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

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890 FORTY FOOT RD
PO BOX 352
LANSDALE, PA 19446-0352

Facility: SKF AEROENGINE NORTH AMERICA
ONE MAROCO RD
FALCONER, NY 14733-0263

Authorized Activity By Standard Industrial Classification Code:
3499 - FABRICATED METAL PRODUCTS, NEC
9999 - NONCLASSIFIABLE ESTABLISHMENTS
3562 - BALL AND ROLLER BEARINGS

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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, required to operate such device effectively.

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Non Applicable requirements
Effective between the dates of 06/17/2019 and 06/16/2029

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 WWWWWW

Reason: Subpart WWWWWW – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations: SKF Aeroengine does not operate a dry mechanical polishing operation subject to this rule. Process 06A does not include polishing of finished metals or formed products after plating.

40 CFR Part 63, Subpart XXXXXX

Reason: Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories: SKF Aeroengine is not subject to this NESHAP since the facility is primarily engaged in manufacturing associated with SIC code of 3562 and NAICS code of 332991 which are not applicable categories.

Condition 2: Visible Emissions Limited
Effective between the dates of 06/17/2019 and 06/16/2029

Applicable Federal Requirement:6 NYCRR 211.2

Item 2.1:

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.

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Condition 3: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PROCESS SOURCES
PART 212 - 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. Visible emissions are not expected when properly operated. If any visible emissions are identified, inspect the source and restore operation of the emission unit (including the control device, if any, and the associated capture system) to its normal operation as expeditiously as practicable.

(3) Records of any visible emission event shall be maintained to include: (1) date and length of time any visible emissions were observed, (2) the corrective action taken, and (3) the length of time the source was out of service or operating with visible emissions. The records shall be kept on-site and made available to the Department upon request.

(4) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation from any process emission source.

(5) Upon request, a written report of any visible emission event shall be submitted to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration

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Effective between the dates of 06/17/2019 and 06/16/2029

Applicable Federal Requirement:6 NYCRR Part 226**Item 4.1:**

The Compliance Demonstration activity will be performed for the Facility.

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

**SOLVENT METAL CLEANING
COLD CLEANING DEGREASER**

The facility operates cold cleaning degreasers. The emission sources are listed as exempt or trivial activities in 6 NYCRR Part 201-3. This means these sources are exempt from the permitting provisions of Subpart 201-5 and are not required to be listed in the permit. However, this does not mean that these activities are exempted from other applicable requirements. As such, unless these sources are specifically exempt from the solvent metal cleaning regulation under 6 NYCRR Part 226.6, then these sources must comply with the requirements of Part 226, where applicable.

(A) EQUIPMENT SPECIFICATIONS

The following four (4) types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning when the internal volume of the machine is greater than two gallons:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical.
- (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. Remote reservoir degreasers are exempt from this requirement.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C. On or after January 1, 2004, the person conducting solvent metal cleaning covered by this subdivision must use compliant solvents or have submitted a process specific RACT demonstration pursuant to section 226.5 of this Part.

(B) OPERATING REQUIREMENTS:

When cold cleaning, the clean parts must be drained at least 15 seconds or until dripping ceases.

(C) GENERAL REQUIREMENTS:

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- A Person conducting solvent metal cleaning must:
- (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
 - (2) Maintain equipment to minimize leaks and fugitive emissions.
 - (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
 - (4) Keep the degreaser cover closed except when:
 - (a) parts are being placed into or being removed from the degreaser;
 - (b) adding or removing solvent from the degreaser;
 - (c) no solvent is in the degreaser; or
 - (d) when manually cleaning metal parts in the cold cleaning degreaser.
 - (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
 - (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
 - (7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.
 - (a) the name and address of the solvent supplier;
 - (b) the type of solvent including the product or vendor identification number; and
 - (c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 5: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

Applicable Federal Requirement:6 NYCRR 212-3.1 (e)

Item 5.1:

The Compliance Demonstration activity will be performed for:

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Emission Unit: F-00001
Process: 01C

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

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PART 212-3 VOC RACT
EMISSION POINT EP221

(1) Emission Point 221 and the associated emission sources were removed from the facility in the year 2010. Process 01C included a Magnaflux Dip Tank (DT45) and Parts Washer (PW12) which vented through emission point EP221.

(2) The prior Reasonably Available Control Technology (RACT) requirements for Volatile Organic Compound (VOC) emissions from this emission point are no longer required.

(3) No further reporting or recordkeeping is required for this process.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

Applicable Federal Requirement:6 NYCRR 212-3.1 (e)

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
Process: 03A

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

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PART 212-3 VOC RACT
EMISSION POINT EP135

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(1) Emission point EP135 was re-evaluated for the Reasonably Available Control Technology (RACT) requirements for Volatile Organic Compound (VOC) emissions at Major Facilities, as required under 6 NYCRR Part 212-3(e). This section states any facility subject to VOC RACT will remain subject to these provisions even if the annual potential to emit VOCs later fall below the applicability threshold. SKF demonstrated in the updated VOC RACT analysis that an overall removal efficiency of 81% could not be met due to reasons of both technological and economic feasibility. The original VOC RACT analysis also concluded that the overall removal efficiency of 81% could not be met due to reasons of both technological and economic feasibility. Therefore, VOC RACT controls are not required for these sources. The department approved a variance from VOC RACT when the initial Title V permit was issued on January 9, 2006. The Department has re-approved and submitted the variance to the USEPA as a source specific revision to the State Implementation Plan. The approved source specific VOC RACT determination is effective for the duration of the permit.

(2) The source specific VOC RACT determination must be re-evaluated as part of the application for the renewal permit, unless the emission source owner chooses to comply with applicable presumptive RACT regulations. The re-evaluation must contain the latest control technologies and strategies available for review.

(3) Emission point EP135 was also analyzed under 6 NYCRR Part 212-2 to ensure emissions from this source comply with the emission requirements specified in 6 NYCRR Part 212-2.3, Table 4.

(4) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
Process: 06A

Regulated Contaminant(s):

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CAS No: 0NY075-00-0 PARTICULATES

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

PROCESS 06A
METAL MACHINING SOURCES
PART 212 - PARTICULATE MATTER (PM) EMISSION LIMIT

The control of particulate emissions generated from the metal machining 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 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).
- (2) Compliance with this requirement shall be completed by operating and maintaining each dust collection system in accordance with manufacturer recommendations.
- (3) As per 212-1.7(a) 'Sampling and monitoring' section, facility owners and/or operators of a process emission source required by the department to demonstrate compliance with this Part may be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to Part 202 of this Title.
- (4) Maintenance records shall be kept on-site and be made available to the Department upon request.
- (5) Upon request, a written report of any malfunction of the control equipment shall be submitted to the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 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

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STATE ONLY ENFORCEABLE CONDITIONS****** Facility Level ********NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

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

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

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

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 8: Contaminant List
Effective between the dates of 06/17/2019 and 06/16/2029

Applicable State Requirement:ECL 19-0301

Item 8.1:

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 9: Malfunctions and start-up/shutdown activities
Effective between the dates of 06/17/2019 and 06/16/2029

Applicable State Requirement:6 NYCRR 201-1.4

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Item 9.1:

- (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 10: Emission Unit Definition
Effective between the dates of 06/17/2019 and 06/16/2029**Applicable State Requirement: 6 NYCRR Subpart 201-5****Item 10.1:**

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

Emission Unit: F-00001

Emission Unit Description:

Emission unit F-00001 includes product manufacturing of bearings for the aerospace industry, quality assurance testing, etching, polishing, grinding, machining and washing of metal parts. These manufacturing sources are located in Building 1 and Building 6. The emission sources associated with this emission unit include sources evaluated under 6 NYCRR Part 212 and other exempt and

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trivial sources.

Building(s): BLDG-01
BLDG-06

Item 10.2:

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

Emission Unit: F-00002

Emission Unit Description:

Emission Unit F-00002 includes heat treatment of metal parts. The heat treatment equipment includes an electric ECM Technologies low pressure vacuum carburizing machine using a nitrogen atmosphere, either a gas or oil quench process and an ECM wash system. The emission unit also includes DMP electric heat treat furnaces. These sources are located in Building 8. The emission sources associated with this emission unit include sources evaluated under 6 NYCRR Part 212 and other exempt and trivial sources.

Building(s): BLDG-08

Item 10.3:

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

Emission Unit: F-00003

Emission Unit Description:

Emission Unit F-00003 includes emission sources associated with research & development, product development & testing, and maintenance. The sources are located in Building 2 and Building 3. The emission sources associated with this emission unit include sources evaluated under 6 NYCRR Part 212 and other exempt and trivial sources.

Building(s): BLDG-02
BLDG-03

Condition 11: Renewal deadlines for state facility permits
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 11.1:

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 12: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

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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:

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: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 13: Air pollution prohibited

Effective between the dates of 06/17/2019 and 06/16/2029

Applicable State Requirement:6 NYCRR 211.1

Item 13.1:

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.

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

Condition 14: Emission Point Definition By Emission Unit

Effective between the dates of 06/17/2019 and 06/16/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 14.1:

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

Emission Unit: F-00001

Emission Point: EP135

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Height (ft.): 32 NYTMN (km.): 4671.6	Diameter (in.): 21 NYTME (km.): 154.3	Building: BLDG-01
Emission Point: EP139 Height (ft.): 58 NYTMN (km.): 4671.6	Diameter (in.): 13 NYTME (km.): 154.3	Building: BLDG-01
Emission Point: EP142 Height (ft.): 35 NYTMN (km.): 4671.6	Diameter (in.): 12 NYTME (km.): 154.3	Building: BLDG-01
Emission Point: EP143 Height (ft.): 49 NYTMN (km.): 4671.6	Diameter (in.): 12 NYTME (km.): 154.3	Building: BLDG-01
Emission Point: EP144 Height (ft.): 38 NYTMN (km.): 4671.6	Diameter (in.): 10 NYTME (km.): 154.3	Building: BLDG-01
Emission Point: EP146 Height (ft.): 55 NYTMN (km.): 4671.6	Diameter (in.): 13 NYTME (km.): 154.3	Building: BLDG-01
Emission Point: EP205 Height (ft.): 31 NYTMN (km.): 4671.6	Diameter (in.): 14 NYTME (km.): 154.3	Building: BLDG-06
Emission Point: EP206 Height (ft.): 55 NYTMN (km.): 4671.6	Diameter (in.): 18 NYTME (km.): 154.3	Building: BLDG-06
Emission Point: EP210 Height (ft.): 39 NYTMN (km.): 4671.6	Diameter (in.): 14 NYTME (km.): 154.3	Building: BLDG-06
Emission Point: EP211 Height (ft.): 33 NYTMN (km.): 4671.6	Diameter (in.): 18 NYTME (km.): 154.3	Building: BLDG-06
Emission Point: EP225 Height (ft.): 50 NYTMN (km.): 4671.6	Diameter (in.): 11 NYTME (km.): 154.3	Building: BLDG-06

Item 14.2:

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

Emission Unit: F-00002		
Emission Point: EX003 Height (ft.): 28 NYTMN (km.): 4671.6	Diameter (in.): 3 NYTME (km.): 154.3	Building: BLDG-08
Emission Point: EX1&2		

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Height (ft.): 28 Diameter (in.): 4
 NYTMN (km.): 4671.6 NYTME (km.): 154.3 Building: BLDG-08

Item 14.3:

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

Emission Unit: F-00003

Emission Point: EP502
 Height (ft.): 30 Diameter (in.): 5
 NYTMN (km.): 4671.6 NYTME (km.): 154.3 Building: BLDG-03

Condition 15: Process Definition By Emission Unit
Effective between the dates of 06/17/2019 and 06/16/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 15.1:

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

Emission Unit: F-00001
 Process: 005 Source Classification Code: 3-09-011-04

Process Description:
 Process 005 is the parts cleaning process located in the Preservation Room. The cleaning process begins in Parts Washer PW31 to remove dirt and finger prints from the parts. The parts are further cleaned in the Immersion Washer that consists of a dip tank (DT07), parts washer (PW10) followed by hot and cold drying chambers (DR03). Solvent and chemical losses from the process tanks are due to product drag-out and evaporation. The emissions from parts washer PW31 are vented through EP139. Emissions from the Immersion Washer vent through EP144 (dip tank) and EP142 (parts washer and drying chambers).

Emission Source/Control: 0DR03 - Process

Emission Source/Control: 0DT07 - Process

Emission Source/Control: 0PW10 - Process

Emission Source/Control: 0PW31 - Process

Item 15.2:

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

Emission Unit: F-00001
 Process: 01B Source Classification Code: 3-09-011-99

Process Description:
 Process 01B is the Magnaflux inspection and quality assurance & quality control (QA/QC) testing of ferrous metal bearings and bearing components. Bearings and bearing components are dipped in a Magna Flux solution.

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Solution loss from the tank is associated with product drag-out and evaporation. The emissions from the tank are vented to emission point EP205.

Emission Source/Control: 0DT43 - Process

Item 15.3:

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

Emission Unit: F-00001
 Process: 01C Source Classification Code: 3-09-011-99
 Process End Date: 7/1/2010
 Process Description:

The facility has removed the emission sources and emission points associated with Process 01C. Process 01C included a Magnaflux Dip Tank (DT45) and Parts Washer (PW12) which vented through emission point EP221. These two emission sources were removed from the facility in the year 2010. Emission point EP221 was subsequently capped.

Emission Source/Control: 0DT45 - Process

Emission Source/Control: 0PW12 - Process

Item 15.4:

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

Emission Unit: F-00001
 Process: 023 Source Classification Code: 3-09-011-99
 Process Description:

Process 023 is the process where ferrous metal bearing components are dipped in a rust inhibitor tank (PW23A), which is approximately 126 gallons. Solvent or chemical losses from the tank are associated with product drag-out and evaporation. The emissions from the tank are vented through EP225.

Emission Source/Control: PW23A - Process
 Design Capacity: 126 gallons

Item 15.5:

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

Emission Unit: F-00001
 Process: 033 Source Classification Code: 3-09-011-99
 Process Description:

Process 033 includes a Blackstone Parts Wash line for the application of a Rust Inhibitor. There are five (5) tanks in this process and each tank is approximately 208 gallons. Solvent or chemical losses from the tanks are associated with product drag-out and evaporation. The emissions from all tanks are vented through emission point EP146.

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Emission Source/Control: PW33C - Process
 Design Capacity: 208 gallons

Item 15.6:

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

Emission Unit: F-00001
 Process: 034 Source Classification Code: 3-09-011-99
 Process Description:

Process 034 includes a Blackstone Parts Wash line for the application of a Rust Inhibitor. There are five (5) tanks in this process and each tank is approximately 208 gallons. Solvent or chemical losses from the tanks are associated with product drag-out and evaporation. The emissions from all tanks are vented through emission point EP143.

Emission Source/Control: PW34C - Process
 Design Capacity: 208 gallons

Item 15.7:

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

Emission Unit: F-00001
 Process: 03A Source Classification Code: 3-09-011-99
 Process Description:

Process 03A is the Ring Line (Big House) Nital Etch process, where ferrous metal bearings and bearing components are dipped in a series of process tanks. There are twelve (12) tanks in this process and each tank is approximately 80 gallons. Solvent or chemical losses from the tanks are associated with product drag-out and evaporation. The majority of the tank emissions vent through emission point EP135.

Emission Source/Control: RG004 - Process

Emission Source/Control: RG005 - Process

Emission Source/Control: RG007 - Process

Emission Source/Control: RG009 - Process

Item 15.8:

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

Emission Unit: F-00001
 Process: 03B Source Classification Code: 3-09-011-99
 Process Description:

Process 03B is the Roll Line Nital Etch process, where ferrous metal bearings and bearing components are dipped in a series of process tanks. There are eleven tanks in

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this process and each tank is approximately 45 gallons. Solvent or chemical losses from the tanks are associated with product drag-out and evaporation. The emissions from all tanks, except Tank #11, are vented through emission point EP206.

Emission Source/Control: RL004 - Process

Emission Source/Control: RL005 - Process

Emission Source/Control: RL007 - Process

Item 15.9:

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

Emission Unit: F-00001

Process: 06A

Source Classification Code: 3-09-003-03

Process Description:

Process 06A includes particulate emitting processes associated with bench stations conducting metal drilling, grinding, milling, and polishing. The particulate emissions from these emission sources are controlled by a cyclone separator and vented through EP210.

Emission Source/Control: ES210 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: ES211 - Process

Item 15.10:

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

Emission Unit: F-00001

Process: ZYG

Source Classification Code: 3-09-011-99

Process Description:

Process ZYG is the Zyglo fluorescent penetrant inspection (FPI) and QA/QC testing of ferrous metal bearings and bearing components. Bearings and bearing components are dipped in a series of four tanks. There are four (4) tanks in this process and each tank is approximately 27 gallons. Solvent or chemical losses from the tanks are associated with product drag-out and evaporation. The emissions from all tanks are vented through emission point EP211.

Emission Source/Control: ZY001 - Process

Design Capacity: 30 gallons

Emission Source/Control: ZY003 - Process

Design Capacity: 30 gallons

Item 15.11:

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

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Emission Unit: F-00002

Process: 007

Source Classification Code: 3-04-022-01

Process Description:

Process 007 is the low-pressure vacuum carburizing process known as ECM which includes associated oil quenching and washing steps. This process has eight (8) emission points used to vent emissions from an ECM Heating & Carburizing Cell, ECM Oil Quench Cell, two (2) wash processes, vacuum pumps and acetylene tanks.

Emission Source/Control: VDP01 - Process

Emission Source/Control: VDP03 - Process

Emission Source/Control: VDP04 - Process

Item 15.12:

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

Emission Unit: F-00003

Process: BSH

Source Classification Code: 3-09-001-98

Process Description:

Process BSH is the manufacture of bushings for vibration insulation. The manufacturing process includes mixing toluene with a silicone compound under a chemical hood. The emissions are vented through EP502.

Emission Source/Control: 50201 - Process

Condition 16: Compliance Demonstration

Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001

Process: 005

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PART 212 EVALUATION
PROCESS 005
PRESERVATION ROOM

(1) The contaminants emitted from the process tanks were evaluated in accordance with 6 NYCRR Part 212-2.1(b).

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(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are protective of human health and the environment.

(3) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(4) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
 Process: 01B

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PART 212 EVALUATION
 PROCESS 01B
 MAGNAFLUX INSPECTION

(1) The contaminants emitted from the Magnaflux process tank were evaluated in accordance with 6 NYCRR Part 212-2.1(b).

(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air dispersion modeling to demonstrate that the maximum

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offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are protective of human health and the environment.

(3) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(4) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
 Process: 023

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

PART 212 EVALUATION
 PROCESS 023
 RUST INHIBITOR

(1) The contaminants emitted from this process tank were evaluated in accordance with 6 NYCRR Part 212-2.1(b).

(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are protective of human health and the environment.

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(3) As per 6 NYCRR Part 212-1.4(a), emissions from sources that are listed as exempt or trivial activities in 6 NYCRR Part 201-3, are not subject to the provisions of Part 212 and were not evaluated. The exempt sources include a conveyORIZED parts washer (PW004) and a parts washer (PW024).

(4) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(5) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
 Process: 033

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

PART 212 EVALUATION
 PROCESS 033
 BLACKSTONE PARTS WASH LINE

(1) The contaminants emitted from one (1) process tank used for the application of rust inhibitor were evaluated in accordance with 6 NYCRR Part 212-2.1(b).

(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are

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protective of human health and the environment.

(3) As per 6 NYCRR Part 212-1.4(a), emissions from sources that are listed as exempt or trivial activities in 6 NYCRR Part 201-3, are not subject to the provisions of Part 212 and were not evaluated. The exempt sources include a pre-wash tank, wash tank, and two (2) rinse tanks.

(4) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(5) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
 Process: 034

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

PART 212 EVALUATION
 PROCESS 034
 BLACKSTONE PARTS WASH LINE

(1) The contaminants emitted from one (1) process tank used for the application of rust inhibitor (PW34C) were evaluated in accordance with 6 NYCRR Part 212-2.1(b).

(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated

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the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are protective of human health and the environment.

(3) As per 6 NYCRR Part 212-1.4(a), emissions from sources that are listed as exempt or trivial activities in 6 NYCRR Part 201-3, are not subject to the provisions of Part 212 and were not evaluated. The exempt sources include a pre-wash tank, wash tank, and two (2) rinse tanks.

(4) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(5) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
 Process: 03A

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

PART 212 EVALUATION
 PROCESS 03A
 RING LINE (BIG HOUSE) NITAL ETCH

(1) The contaminants emitted from four (4) process tanks were evaluated in accordance with 6 NYCRR Part 212-2.1(b). The four (4) tanks included: Tank #4 Alcohol rinse, Tank #5 Nitric Acid & Alcohol, Tank #7 Hydrochloric Acid & Alcohol, and Tank #9 Ferric Chloride.

(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air

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dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are protective of human health and the environment.

(3) As per 6 NYCRR Part 212-1.4(a), emissions from sources that are listed as exempt or trivial activities in 6 NYCRR Part 201-3, are not subject to the provisions of Part 212 and were not evaluated. The exempt sources include tanks #1, #2, #3, #6, #8, #10, and #11. Tank #12 vents to the room and not through an emission point. The air dispersion modeling methods cannot be used to predict potential impacts from Tank #12, and therefore, a 6NYCRR Part 212 evaluation is not required.

(4) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(5) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 22: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 22.1:
 The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
 Process: 03B

Item 22.2:
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

PART 212 EVALUATION
 PROCESS 03B
 ROLL LINE NITAL ETCH

(1) The contaminants emitted from three (3) tanks in the Roll Line Nital Etch Process were evaluated in accordance with 6 NYCRR Part 212-2.1(b). The three (3) tanks included: Tank #4 Alcohol rinse, Tank #5 Nitric Acid &

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Alcohol, and Tank #7 Hydrochloric Acid & Alcohol.

(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are protective of human health and the environment.

(3) As per 6 NYCRR Part 212-1.4(a), emissions from sources that are listed as exempt or trivial activities in 6 NYCRR Part 201-3, are not subject to the provisions of Part 212 and were not evaluated. The exempt sources include tanks #1, #2, #3, #6, #8, #9, and #10. Tank #11 vents to the room and not through an emission point. The air dispersion modeling methods cannot be used to predict potential impacts from Tank #11, and therefore, a 6NYCRR Part 212 evaluation is not required.

(4) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(5) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 23: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

Applicable State Requirement:6 NYCRR 212-2.2

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
 Process: 06A

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

PART 212-2 EVALUATION
 PROCESS 06A

METAL MACHINING SOURCES

(1) The particulate contaminants emitted from these metal processes were evaluated in accordance with 6 NYCRR Part 212-2.1. Air contaminants listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant (HTAC) List shall either not exceed the mass emission limit (MEL) listed or demonstrate compliance with the air cleaning requirements as specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department.

(2) Chromium is listed in Table 2 as a HTAC. Chromium is emitted from the metal processes at a rate less than the 0.1 pound per year MEL. As such, the chromium emissions comply with the Part 212 requirements.

(3) As per 6 NYCRR Part 212-1.4(a), emissions from sources that are exempt from being listed in the permit are not subject to the provisions of Part 212 and were not evaluated. The exempt sources include two polishing mills that use corn cob polishing media and a manual powder coating process at the Zyglo FPI Station. These exempt sources also vent through EP210.

(4) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(5) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 24: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00001
 Process: ZYG

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

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PART 212 EVALUATION
PROCESS ZYG
INSPECTION QA/QC

(1) The contaminants emitted from two (2) tanks in the Zyglo fluorescent penetrant inspection process were evaluated in accordance with 6 NYCRR Part 212-2.1(b). The two (2) tanks included the Penetrant Tank and the Zyglo Remover/Emulsifier Tank.

(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are protective of human health and the environment.

(3) As per 6 NYCRR Part 212-1.4(a), emissions from sources that are exempt from being listed in the permit are not subject to the provisions of Part 212 and were not evaluated. The exempt sources include a pre-rinse tank, post-rinse tank, ultrasonic hot washer, and a small electric drying oven.

(4) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(5) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 25: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

Applicable State Requirement:6 NYCRR 212-2.3 (b)**Item 25.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00002
Process: 007

Item 25.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PART 212 EVALUATION
PROCESS 007
CARBURIZING SOURCES

(1) The contaminants emitted from the vacuum pumps through emission points EX1&2 and EX003 were evaluated in accordance with 6 NYCRR Part 212-2.1(b). Emission point EX1&2 vents emissions from two vacuum pumps for the ECM Oil Quench Cell. In the oil quenching cell, hot parts are placed in a 1,525 gallon oil bath to cool and harden the metal parts. The exhaust from the cell is vented through a Sogevac exhaust oil filter prior to discharge to the atmosphere. Emission point EX003 vents emissions from one vacuum pump for the ECM Heating & Carburizing Cell.

(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6 NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are protective of human health and the environment.

(3) As per 6 NYCRR Part 212-1.4(a), emissions from sources that are listed as exempt or trivial activities in 6 NYCRR Part 201-3, are not subject to the provisions of Part 212 and were not evaluated. The exempt sources include an emergency relief vent (EX004), nitrogen vent (EX005), two vacuum pumps venting nitrogen (EX06A) and EX06B), a 3-stage tunnel wash system (EX007), and a batch wash system (EX008).

(4) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(5) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 26: Compliance Demonstration
Effective between the dates of 06/17/2019 and 06/16/2029

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

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Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00003

Process: BSH

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PART 212 EVALUATION
PROCESS BSH
BUSHING PDT

(1) The contaminants emitted from the bushing product development line (50201) were evaluated in accordance with 6 NYCRR Part 212-2.1(b).

(2) Emissions of the non-HTACs were given environmental ratings of B or C and are subject to 6NYCRR Part 212-2.3(b), Table 4, which requires a source having an emission rate potential less than 10 lbs/hr to use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The AERSCREEN analysis demonstrated the potential non-HTAC emissions resulted in ambient concentrations below the SGC and AGC thresholds which are protective of human health and the environment.

(3) At the discretion of the department, a revised Part 212 evaluation maybe required with the next permit renewal due to regulatory or process changes.

(4) No records or reporting are required for this permit condition unless requested by the Department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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