



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-0699-00056/02001
Effective Date: 12/28/2005 Expiration Date: No expiration date

Permit Issued To: VALEO EQUIPMENT 3 US INC
2258 ALLEN ST
JAMESTOWN, NY 14701

Contact: ANGELA RICOTTA
VALEO ENGINE COOLING TRUCK DIV
2258 ALLEN ST
JAMESTOWN, NY 14701
(716) 665-7227

Facility: VALEO INC ENGINE COOLING TRUCK DIVISION
2258 ALLEN ST
JAMESTOWN, NY 14701

Description:

FACILITY DESCRIPTION:

Valeo, Inc., located at 2258 Allen Street in the Town of Ellicott, Chautauqua County, manufactures radiators and charge air coolers for the heavy truck industry. Processes at the facility include metal forming, parts cleaning, soldering, welding, drying, painting and laboratory testing.

EMISSIONS AND CONTROLS:

Valeo is potentially a major source of volatile organic compound (VOC) emissions since the potential to emit (PTE) VOC exceeds 50 tons per year (tpy). Valeo does not have add-on air pollution control equipment on the VOC emission sources, however, the facility has elected to cap emissions below the major source threshold by limiting material usage. This permit limits facility-wide VOC emissions to 45 tpy.

The facility is a minor source of particulate emissions. The facility utilizes paint filters to control particulate emissions from the painting operations. The remaining particulate sources are uncontrolled.

Valeo is a minor source of hazardous air pollutants (HAPs). Two individual HAPs, including lead oxide and hydrogen fluoride, were evaluated by the Department using DAR-1 guidance. The majority of lead oxide emissions are generated from a solder pot used to melt tin-lead ingots. The emissions are exhausted through Emission Point 14B29. A DAR-1 analysis was completed using potential lead oxide emissions of 232 lbs/yr and 0.026 lbs/hr. The impact analysis demonstrated compliance with the short-term and long-term impact guidance values.

Hydrogen fluoride emissions are generated in the CAB brazing furnaces when fluoride base flux is converted into hydrogen fluoride gas. The emissions from the furnace are exhausted through alumina scrubbers (EP 01486 and EP14A46) with a reported efficiency of 90%. A DAR-1 analysis was completed using pre-control hydrogen fluoride emissions of 494 lbs/yr and 0.058 lbs/hr. The impact



analysis demonstrated compliance with the short-term and long-term impact guidance values.

Lead oxide and hydrogen fluoride are each B rated contaminants. In accordance with Table 2 of 6NYCRR Part 212.9, the degree of air cleaning required for B rated contaminants with an emission rate potential less than 1 lb/hr shall be specified by the Department. Since both contaminants demonstrated compliance with the DAR-1 impacts, the existing operational methods are acceptable for Emission Points 14B29, 01486 and 14A46.

APPLICABLE REQUIREMENTS:

6NYCRR Part 201-7:

In accordance with 6NYCRR Part 201-7.2, Valeo has federally enforceable permit terms and conditions which limit emissions from the facility in order to avoid the requirement to obtain a Title V facility permit. Facility-wide emissions of total volatile organic compounds (VOC) from all emission sources, including exempt and trivial activities, are limited to 45 tpy.

6NYCRR Parts 212.4(c), 212.6(a):

The General Process Regulations of Part 212 specify a limit on solid particulate discharges of 0.05 grains per dry standard cubic foot and 20 percent opacity.

6NYCRR Part 212.10(c)(4)(iii):

Valeo submitted a VOC RACT Compliance Plan dated November 15, 1999. Valeo demonstrated that a removal efficiency less than RACT was both technologically and economically feasible. Valeo installed micro-coat applicators to reduce oil consumption on 19 machines by September 15, 2000. In addition, Valeo requested a variance from the VOC RACT requirement of an overall 81% removal efficiency which was approved by the Department and subject to a federal State Implementation Plan (SIP) revision.

6NYCRR Part 212.10(e):

In accordance with 6NYCRR Part 212.10(e), even though the facility is now limiting VOC emissions below 50 tpy, the facility still remains potentially subject to the VOC RACT requirements.

6NYCRR Part 212.10(f):

Any process change that could increase the emissions of VOCs above 3.0 lbs/hr and 15 lbs/day in Emission Unit R-ABAR1 or N-NOCO1 could cause the emission points to become subject to the VOC RACT requirements.

6NYCRR Part 228:

Surface coatings may contain a maximum of 3.5 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) as applied. The surface coating processes at Valeo include miscellaneous metal parts utilizing air dried or forced warm air dried at a temperature up to 90 degrees centigrade.

6NYCRR Part 231-2:

In June, 1999, Valeo installed a second controlled atmosphere brazing furnace and a fourth vacuum braze furnace to debottleneck the production of aluminum parts and add production capacity to these operations. The facility elected to limit VOC emissions below the New Source Review (NSR) applicability threshold of 40 tpy for the source project. The existing potential to emit VOC emissions



from the aluminum core production area was 45 tpy. As such, the facility accepted a limit on the aluminum production area emissions to 85 tpy VOC.

In this new State Facility permit, Valeo is limiting facility-wide VOC emissions below 45 tpy. The new facility-wide 45 tpy limit is more stringent than the existing 85 tpy limit on the aluminum production area. As such, the 85 tpy limit has been removed from this permit. However, should the facility at a later date, modify this permit to increase VOC emissions either through production increases or a modification, compliance with the 85 tpy limit would need to be re-evaluated. In addition, any future NSR applicability evaluations shall consider the facility as an existing major source.

NON-APPLICABLE REQUIREMENTS:

40 CFR Part 64 - Compliance Assurance Monitoring (CAM):

As per 40 CR 64.2(a), Valeo is not applicable to the Compliance Assurance Monitoring Rule because the facility is not a major source required to obtain a Title V permit.

40CFR63 Subpart MMMM - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products:

Valeo is not applicable to this National Emission Standard because the facility is not a major source of hazardous air pollutants.

40CFR63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters:

Valeo is not applicable to this National Emission Standard because the facility is not a major source of hazardous air pollutants.

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: DOUGLAS E BORSCHEL
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and
Determinations
Applications for Permit Renewals and Modifications
Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION
9 HEADQUARTERS



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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 3.1:

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

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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

Condition 4: Permit Modifications, Suspensions and Revocations by the Department



Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

The Department reserves the right 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 Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.5(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 14203-2999
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-0699-00056/02001

Facility DEC ID: 9069900056



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: VALEO EQUIPMENT 3 US INC
2258 ALLEN ST
JAMESTOWN, NY 14701

Facility: VALEO INC ENGINE COOLING TRUCK DIVISION
2258 ALLEN ST
JAMESTOWN, NY 14701

Authorized Activity By Standard Industrial Classification Code:
3714 - MOTOR VEHICLE PARTS & ACCESSORIES

Permit Effective Date: 12/28/2005

Permit Expiration Date: No expiration date.



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 and Modifications
- Permit Modifications, Suspensions and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 201-7: Facility Permissible Emissions
- *2 6NYCRR 201-7: Capping Monitoring Condition
- 3 6NYCRR 212.4(c): Compliance Demonstration
- 4 6NYCRR 212.6(a): Compliance Demonstration
- 5 6NYCRR 212.10(e): RACT Applicability for Major Facilities
- 6 6NYCRR 212.10(f): Compliance Demonstration

Emission Unit Level

EU=E-PAINT

- 7 6NYCRR 228.4: Compliance Demonstration
- 8 6NYCRR 228.5(a): Compliance Demonstration
- 9 6NYCRR 228.7: Compliance Demonstration
- 10 6NYCRR 228.10: Compliance Demonstration

EU=V-VOIL1

- 11 6NYCRR 212.10(c)(4)(iii): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 12 ECL 19-0301: Contaminant List
- 13 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 14 6NYCRR 201-5: Emission Unit Definition
- 15 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 16 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 17 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 200.7

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



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

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

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

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

Item E: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

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

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

(4) The facility owner and/or operator notified the Department

within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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



Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

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

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

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

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

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

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

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

Item J: Required Emission Tests - 6 NYCRR Part 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 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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.

Item L: Open Fires - 6 NYCRR Part 215

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

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

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

FEDERAL APPLICABLE REQUIREMENTS



The following conditions are federally enforceable.

**Condition 1: Facility Permissible Emissions
Effective between the dates of 12/28/2005 and Permit Expiration Date**

Applicable Federal Requirement:6NYCRR 201-7

Item 1.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0

PTE: 90,000 pounds per year

Name: VOC

**Condition 2: Capping Monitoring Condition
Effective between the dates of 12/28/2005 and Permit Expiration Date**

Applicable Federal Requirement:6NYCRR 201-7

Item 2.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 2.2:

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

Item 2.3:

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

Item 2.4:

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

Item 2.5:

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

Item 2.6:



The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

In accordance with 6NYCRR Part 201-7.2, Valeo will accept the following federally enforceable permit terms and conditions which restrict or cap emissions from the facility in order to avoid the requirement to obtain a Title V facility permit:

- 1.) Facility-wide emissions of total volatile organic compounds (VOC) from all emission sources, including exempt and trivial activities, are limited to 45 tons per year (tpy).
- 2.) Approximately 95% of all VOC emissions are emitted from permitted emission sources. The remaining 5% of VOC emissions are emitted from Exempt and Trivial Sources, including but not limited to, laboratory exhaust, manual spray painting and brake cleaners. As such, the facility has proposed monthly monitoring of permitted sources and annual monitoring of permitted, exempt and trivial sources to demonstrate compliance with the emission limit.
- 3.) Monthly VOC emissions shall be monitored and recorded in a log for the permitted emission sources by summing the amount of VOC contained in the materials purchased during each month and subtracting the VOC present in waste removed for disposal during that same month. Each month, Valeo must compute from the monthly emission records, a rolling 12-month emission rate by summing the previous consecutive 11 month VOC emissions to the current individual monthly VOC emissions. If the 12-month emissions from the permitted emission sources is greater than 42 tpy, then VOC emissions from the exempt and trivial sources will immediately be inventoried and tracked on a permanent basis.
- 4.) The annual certification shall be submitted on Department forms available at www.dec.state.ny.us. The annual certification shall include a worst case analysis by selecting the highest 12-month emission rate of the permitted sources and adding the total annual emissions from the exempt and trivial sources. The resulting total annual emissions shall be compared to the 45 tpy limit.



The annual certification shall be submitted on or before January 30 each year for the previous calendar year. Valeo shall begin submitting an annual certification in the year 2007 for emission inventories of the calendar year 2006.

5.) The monthly and annual records shall be based on verifiable data, such as, purchase and disposal records to confirm the general accuracy of the records.

6.) Any exceedance of the 45 tpy limit shall be reported to the Department within 10 days of obtaining the monthly emission calculation confirmation.

Parameter Monitored: VOC

Upper Permit Limit: 45 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 3: Compliance Demonstration
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 3.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: B-SWELD

Emission Unit: M-MISC1

Emission Unit: C-CUBR1

Emission Unit: N-NOCO1

Emission Unit: R-ABAR1

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.



Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.05 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 4: Compliance Demonstration
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 4.1:

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

Emission Unit: B-SWELD

Emission Unit: M-MISC1

Emission Unit: C-CUBR1

Emission Unit: N-NOCO1

Emission Unit: R-ABAR1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC
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:

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

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: RACT Applicability for Major Facilities
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.10(e)

Item 5.1:

All process sources applicable to 6 NYCRR Part 212.10 after May 31, 1995 will remain subject to all provisions of that section even if the facility's annual potential to emit of nitrogen oxides or volatile organic emissions falls below the applicability thresholds.

Condition 6: Compliance Demonstration
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.10(f)

Item 6.1:

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

Emission Unit: N-NOCO1

Emission Unit: R-ABAR1

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

Item 6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1.) 6NYCRR Part 212.10 requires the submission of a volatile organic compound reasonably available control technology (VOC RACT) evaluation for those facilities with potential VOC emissions greater than 50 tpy. Valeo submitted a VOC RACT Compliance Plan dated November 15, 1999. The results of the VOC RACT analysis indicated the VOC emission rate potential (ERP) was less than 3.0 pounds per hour (lbs/hr), and less than 15.0 pounds per day (lbs/day) for each emission point in Emission Unit R-ABAR1 and N-NOCO1.
- 2.) The Department requested completion of performance emissions testing on the vacuum brazing furnaces and the controlled atmosphere brazing (CAB) furnaces to determine the hourly VOC emission rate potential. The testing was completed at the vacuum pump exhaust of ABAR H and at the CAB 1 heat degreaser on August 30-31, 2000. The measured



VOC emission rate from the vacuum pump exhaust was 0.31 lb/hr (EP 01494). The measured VOC emission rate from the heat degreaser chamber (EP 01474) and the combustion chamber (EP01475) was 0.14 lb/hr and 0.17 lb/hr, respectively. Since the emissions are below 3.0 lbs/hr and 15 lbs/day, the VOC RACT requirements of 6 NYCRR 212.10 do not currently apply to the vacuum brazing furnaces and the controlled atmosphere brazing furnaces.

3.) In accordance with 6NYCRR Part 212.10(e), even though the facility is now limiting VOC emissions below 50 tpy, the facility still remains potentially subject to the VOC RACT requirements. As such, any process change that could increase the emissions of VOCs above 3.0 lbs/hr and 15 lbs/day could cause the emission points to become subject to the VOC RACT requirements. Therefore, the Department reserves the right to request additional testing or other emission evaluations of these emission points to determine applicability to VOC RACT.

Parameter Monitored: VOC

Upper Permit Limit: 3.0 pounds per hour

Reference Test Method: EPA Method 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 7: Compliance Demonstration
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.4

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-PAINT

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person will cause or allow emissions having an average



opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.5(a)

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-PAINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the Department and, upon request, these records must be submitted to the Department. Any facility required to perform the overall removal efficiency calculation, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 9: Compliance Demonstration
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.7

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-PAINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Miscellaneous metal parts and product coating lines, excluding all nonmetallic parts, utilizing air dried or forced warm air dried at a temperature up to 90 degrees centigrade coatings may contain a maximum of 3.5 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: PAINT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: Method 311 or 24

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.10

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-PAINT

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line,



the owner or operator of a facility subject to this Part must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

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

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

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

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

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

(g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:

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

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

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

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

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration



Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.10(c)(4)(iii)

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: V-VOIL1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

REGULATORY REQUIREMENTS:

NYCRR Part 212.10(b) requires the submission of a VOC RACT Compliance Plan which includes either a RACT analysis or a plan to limit the annual potential-to-emit. Valeo Inc., Engine Cooling Truck Division (Valeo) submitted a VOC RACT Compliance Plan dated November 15, 1999. In this RACT Compliance Plan, Valeo has demonstrated, using the guidelines of Air Guide 20, that an overall removal efficiency of 81% required by NYCRR Part 212.10(c)(4)(i) cannot be met due to reasons of both technological and economic feasibility. As a result, Valeo has requested a variance from the 81% removal efficiency requirement under NYCRR Part 212.10(c)(4)(iii). This variance request and process specific RACT Demonstration has been approved by the Department for submission to the United States Environmental Protection Agency for approval as a revision to the State Implementation Plan for New York State.

RACT DEMONSTRATION AND ANALYSIS:

1.) Valeo has shown through economic and technical feasibility analyses that the only cost effective VOC reduction technology is the replacement of lubricating oil spray applicators with micro-coat oil applicators. The micro-coat applicators are capable of applying significantly less oil because they use spray nozzles that operate with relatively low pressure atomizing air. Less oil usage results in lower VOC emissions because these emissions occur as a result of volatilization of the oils.

2.) Oil spray applicators are used in the fabrication of tubes, turbulators and separators, and also in inserting



turbulators into tubes (i.e., tube-stuffers).
Approximately 80% of this emission units VOC emissions come from these oil spray applicators. The micro-coat applicators were installed on 15 machines ((i.e., turbulator mills, separator mills, tube-stuffers) on the Aluminum line. VOC emission reduction has averaged 45% since December, 1999 in the Aluminum Area.

3.) Similar separator mills and a tube mill are used in the Copper/ Brass area, where the micro-coat applicators have been installed on 4 machines. The micro-coat applicators have reduced oil consumption by approximately 75% in this area.

4.) RACT Maintenance:
All 19 lubricant applicators that are considered RACT were installed by September 15, 2000.

To minimize vanishing oil usage, the oil flow control shall be adjusted downward to the maximum extent possible that still provides adequate lubrication for metal forming operations. For every machine that contains a Micro-coat applicator, operators established a reasonable operating range of oil usage that results in the minimum amount of oil needed to meet production requirements. Operators will be required to stay within this operating range. The facility developed written Machine Instructions (called MI's) that describe this operating procedure including the permissible operating range. A Machine Instruction is a written procedure that equipment operators must follow to maintain compliance with Quality System/Environmental Management System quality control procedures.

MI's have been developed for each type of machine (e.g. turbulator mills, separator mills, tube stuffers) that is part of this emission unit and were implemented September 15, 2000. Operators are responsible for following the MI's. The MI's shall be made available to the Department upon request.

5.) The oil spray applicators installed as VOC RACT shall be maintained on existing equipment and evaluated for process feasibility on any new equipment. Where feasible, new equipment specifications will include similar or identical oil spray applicators.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 12: Contaminant List
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 12.1:

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 13: Unavoidable noncompliance and violations
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 13.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described



under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 14: Emission Unit Definition
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 14.1:

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

Emission Unit: B-SWELD

Emission Unit Description:

B-SWELD is comprised of three tig fusion welders (sweep welders) whose emission points are 14B07, 14B13, and 14B25.

Building(s): 14B

Item 14.2:

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

Emission Unit: C-CUBR1

Emission Unit Description:

Emission unit C-CUBR1 is comprised of various operations that occur in the copper/brass assembly area. The operations include: one large dip tank, flux preheater, welded seam mill, lead solder pot, core bake oven and fluxer. The emission points are 14B11, 14B12, 14B14, 14B16, 14B17, 14B29, and 14B36.

Building(s): 14B

Item 14.3:

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

Emission Unit: E-PAINT

Emission Unit Description:

E-PAINT is comprised of paint booths and paint curing ovens for the copper/brass area. Emission points 14B01, 14B02, 14B24, 14B27, and 14B28 exhaust the wet painting of the copper/brass products.



Building(s): 14B

Item 14.4:

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

Emission Unit: M-MISC1

Emission Unit Description:

M-MISC1 is comprised of various miscellaneous operations from throughout the facility. The operations include a tube mill quench oil tank, an EDM cutting machine in maintenance, and a belt sander. The emission points are 14B23, 14C78, and 01464, respectively.

Building(s): 14
14B
14C

Item 14.5:

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

Emission Unit: N-NOCO1

Emission Unit Description:

N-NOCO1 is comprised of controlled atmosphere brazing (CAB) furnaces, heat degreasers, flux curing ovens, and fluxers that are used in the aluminum assembly area. The emission points are 01474, 01475, 14A45, 14A46, 14A47, 01482, 01483, 01484, 01485, and 01486.

Building(s): 14
14A

Item 14.6:

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

Emission Unit: R-ABAR1

Emission Unit Description:

R-ABAR1 is comprised of three vacuum braze furnaces, ABAR units, in the aluminum assembly area. One furnace includes a thermal degreaser. The emissions points are 01487, 01493, 01494, 14A43, 14A44, 14A63, 14A64, and 14A57.

Building(s): 14
14A

Item 14.7:

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

Emission Unit: V-VOIL1

Emission Unit Description:

V-VOIL1 is comprised of tube and fin mills which shape strips of aluminum and copper/brass into tubes and fins for the radiators and charge air coolers. Lubricants are applied to the strips to ease the shaping operation. The lubricants evaporate readily from the parts during the wait for assembly. These lubricants are commonly referred to as vanishing oil. These VOC are the only emissions from this emission unit. The volatilization occurs at



different locations through out the shaping and waiting process until an assembled unit is forwarded to the vacuum brazing furnaces or the CAB process. There are no emission collection points for these VOC sources, they collect in the work room air and are exhausted out the general ventilation system. There are no emission points identified for this emission unit.

Building(s): 14

Condition 15: Air pollution prohibited
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2

Item 15.1:

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 16: Emission Point Definition By Emission Unit
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 16.1:

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

Emission Unit: B-SWELD

Emission Point: 14B07			
Height (ft.): 31	Diameter (in.): 16		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14B	

Emission Point: 14B13			
Height (ft.): 31	Diameter (in.): 16		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14B	

Emission Point: 14B25			
Height (ft.): 31	Diameter (in.): 16		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14B	

Item 16.2:

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



Emission Unit: C-CUBR1

Emission Point: 14B11

Height (ft.): 31 Diameter (in.): 18
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B12

Height (ft.): 31 Diameter (in.): 20
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B14

Height (ft.): 35 Diameter (in.): 16
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B16

Height (ft.): 38 Diameter (in.): 14
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B17

Height (ft.): 38 Diameter (in.): 14
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B29

Height (ft.): 25 Diameter (in.): 18
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B36

Height (ft.): 38 Diameter (in.): 12
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Item 16.3:

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

Emission Unit: E-PAINT

Emission Point: 14B01

Height (ft.): 40 Diameter (in.): 42
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B02

Height (ft.): 40 Diameter (in.): 42
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B24

Height (ft.): 40 Diameter (in.): 30
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B27

Height (ft.): 40 Diameter (in.): 16
 NYTMN (km.): 4670.6 NYTME (km.): 152.2 Building: 14B

Emission Point: 14B28



Height (ft.): 40	Diameter (in.): 14	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14B

Item 16.4:

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

Emission Unit: M-MISC1

Emission Point: 01464		
Height (ft.): 18	Diameter (in.): 6	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14

Emission Point: 14B23		
Height (ft.): 28	Diameter (in.): 16	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14B

Emission Point: 14C78		
Height (ft.): 17	Diameter (in.): 4	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14C

Item 16.5:

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

Emission Unit: N-NOCO1

Emission Point: 01474		
Height (ft.): 20	Diameter (in.): 16	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14

Emission Point: 01475		
Height (ft.): 20	Diameter (in.): 16	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14

Emission Point: 01482		
Height (ft.): 20	Diameter (in.): 16	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14

Emission Point: 01483		
Height (ft.): 20	Diameter (in.): 16	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14

Emission Point: 01484		
Height (ft.): 48	Diameter (in.): 8	
NYTMN (km.): 4670.6	NYTME (km.): 151.9	Building: 14

Emission Point: 01485		
Height (ft.): 48	Diameter (in.): 16	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14

Emission Point: 01486		
Height (ft.): 56	Diameter (in.): 12	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14



Emission Point: 14A45			
Height (ft.): 49	Diameter (in.): 16		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14A	
Emission Point: 14A46			
Height (ft.): 54	Diameter (in.): 12		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14A	
Emission Point: 14A47			
Height (ft.): 49	Diameter (in.): 8		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14A	

Item 16.6:

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

Emission Unit: R-ABAR1			
Emission Point: 01487			
Height (ft.): 48	Diameter (in.): 24		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14	
Emission Point: 01493			
Height (ft.): 44	Length (in.): 42	Width (in.): 42	
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14	
Emission Point: 01494			
Height (ft.): 53	Diameter (in.): 8		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14	
Emission Point: 14A43			
Height (ft.): 45	Diameter (in.): 24		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14A	
Emission Point: 14A44			
Height (ft.): 47	Diameter (in.): 24		
NYTMN (km.): 4670.6	NYTME (km.): 152.2	Building: 14A	
Emission Point: 14A57			
Height (ft.): 53	Diameter (in.): 8		
NYTMN (km.): 4670.6	NYTME (km.): 152.	Building: 14A	
Emission Point: 14A63			
Height (ft.): 30	Diameter (in.): 6		
NYTMN (km.): 4670.6	NYTME (km.): 152.	Building: 14A	
Emission Point: 14A64			
Height (ft.): 30	Diameter (in.): 3		
NYTMN (km.): 4670.6	NYTME (km.): 152.	Building: 14A	

Condition 17: Process Definition By Emission Unit
Effective between the dates of 12/28/2005 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5



Item 17.1:

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

Emission Unit: B-SWELD

Process: WLD

Source Classification Code: 3-12-999-99

Process Description:

This process consists of "tig fusion" welding of copper tubes to brass header plates in the manufacture of large truck radiators.

Emission Source/Control: 0B1S1 - Process

Emission Source/Control: 0B1S2 - Process

Emission Source/Control: 0B1S3 - Process

Item 17.2:

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

Emission Unit: C-CUBR1

Process: CBR

Source Classification Code: 3-09-020-99

Process Description:

In the manufacture of copper/brass radiators, tubes are formed from brass coil stock. Tube seams are induction welded, then tubes are coated with flux and solder. Separators are formed from copper coil stock on fin mills. Tubes and separators are assembled with header plates; joints are preheated in flux and soldered. This core is brazed together.

Emission Source/Control: 0C1S8 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 0C1S2 - Process

Emission Source/Control: 0C1S3 - Process

Emission Source/Control: 0C1S4 - Process

Emission Source/Control: 0C1S5 - Process

Emission Source/Control: 0C1S6 - Process

Emission Source/Control: 0C1S7 - Process

Item 17.3:

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

Emission Unit: E-PAINT

Process: PNT

Source Classification Code: 4-02-002-01

Process Description:

After assembly, copper/brass truck radiators are painted



with a water based liquid paint. Each side of the radiator is automatically sprayed with paint, followed by a manual touch up operation. The radiators are then allowed to flash off (EP 14B27) and are then cured in a 150 degree Fahrenheit oven (EP 14B28).

Emission Source/Control: E1S08 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: E1S09 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: E1S10 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 0E1S2 - Process

Emission Source/Control: 0E1S3 - Process

Emission Source/Control: 0E1S4 - Process

Emission Source/Control: 0E1S5 - Process

Emission Source/Control: 0E1S6 - Process

Item 17.4:

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

Emission Unit: M-MISC1

Process: MCL

Source Classification Code: 3-12-999-99

Process Description:

Emission unit M-MISC1 consists of several different processes. The processes are as follows:

- 1) The quenching of newly soldered tubes with a solution of Mobilmet S122 quenching oil, EP14B23.
- 2) The intermittent use of an EDM machine in the maintenance shop, EP 14C78. This machine uses electrical discharge between electrodes submerged in a special oil in order to cut metal.
- 3) The intermittent use of a stationary belt sander, EP 01464.

Emission Source/Control: 0M1S4 - Process

Emission Source/Control: 0M1S5 - Process

Emission Source/Control: 0M1S7 - Process

Item 17.5:

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

Emission Unit: N-NOCO1



Process: NOC

Source Classification Code: 3-09-042-00

Process Description:

This process is comprised of all operations that take place on the controlled atmosphere brazing (CAB) lines. The first step uses a 450 degree Fahrenheit oven to remove residual oil from aluminum tubes, separators, and turbulators, (heat degreasing). This step is followed by the spraying and submersion of radiator cores in a flux bath. In the final step of this process, the radiator cores are dried in an oven and then brazed at 1120 degrees Fahrenheit.

Emission Source/Control: 0N1S4 - Control

Control Type: PACKED GAS ABSORPTION SYSTEM, GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: N1S11 - Control

Control Type: PACKED GAS ABSORPTION SYSTEM, GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 0N1S1 - Process

Emission Source/Control: 0N1S2 - Process

Emission Source/Control: 0N1S3 - Process

Emission Source/Control: 0N1S5 - Process

Emission Source/Control: 0N1S6 - Process

Emission Source/Control: 0N1S7 - Process

Emission Source/Control: 0N1S8 - Process

Emission Source/Control: 0N1S9 - Process

Emission Source/Control: N1S10 - Process

Emission Source/Control: N1S12 - Process

Item 17.6:

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

Emission Unit: R-ABAR1

Process: ABR

Source Classification Code: 3-09-042-00

Process Description:

This process consists of the vacuum brazing of aluminum heat exchanger components in 1100 degree Fahrenheit ovens. The ovens are referred to as ABAR ovens. Furnace 'Abar H' includes an initial thermal degreasing step at 425 degrees F.

Emission Source/Control: R1S10 - Control



Control Type: MIST ELIMINATOR

Emission Source/Control: R1S11 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: R1S12 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 0R1S2 - Process

Emission Source/Control: 0R1S3 - Process

Emission Source/Control: 0R1S4 - Process

Emission Source/Control: 0R1S6 - Process

Emission Source/Control: 0R1S7 - Process

Emission Source/Control: 0R1S8 - Process

Emission Source/Control: R1S13 - Process

Item 17.7:

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

Emission Unit: V-VOIL1

Process: OIL

Source Classification Code: 3-09-030-07

Process Description:

This process consists of the evaporative loss of lubricants (vanishing oils) from milled components in the aluminum and copper/brass assembly areas.

Emission Source/Control: V1S03 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: V1S04 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 0V1S1 - Process

Emission Source/Control: 0V1S2 - Process

New York State Department of Environmental Conservation

Permit ID: 9-0699-00056/02001

Facility DEC ID: 9069900056

