

New York State Department of Environmental Conservation
Facility DEC ID: 9143000142



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

PAir State Facility

Permit ID: 9-1430-00142/00025

Effective Date: 02/05/2001

Expiration Date: No expiration date

Permit Issued To: DERRICK MANUFACTURING CORP
590 DUKE ROAD
BUFFALO, NY 14225-5102

TOM KOZLOWSKI

DERRICK MANUFACTURING CORPORATION
590 DUKE RD
BUFFALO, NY 14225

(716) 683-9010

Facility: DERRICK MANUFACTURING CORP
590 DUKE ROAD
CHEEKTOWAGA, NY 14225

Description:

Derrick Manufacturing Corp. produces a variety of suspended solids removal equipment which is utilized in the oil and gas, mining and food industries. Manufacture of this equipment involves fabrication of metal parts, painting and assembly. Operations such as building electrical amateurs, lead melting to produce weights for balancing reciprocating parts, powder coating, safety klean degreasers and a host of machining operations related to the construction of all parts to build centrifuges and material screening equipment occur at this plant. This permit is a state facility permit limiting emissions below Title V applicability for VOC and HAP. Western NY is marginal nonattainment for ozone. Emission unit 1 includes 5 paint booths, curing oven and a stator bake oven. Emission unit 2 is for a small lead melting pot for making balancing weights.

Emissions of concern are from the 5 large paint booths which use zinc chromate primers, catalyzed polyurethanes and 2 component epoxy urethanes. The facility is subject to the surface coating requirements of 6 NYCRR part 228 table 1 which limits VOC emissions in paints to 3.5 pounds per gallon as applied. Also of significant importance is the maintenance of particulate control filters with a 97% efficiency to control hazardous air pollutant particulates such as MDI, TDI and zinc chromate contained in the paints. Derrick manufacturing will increase the stack height of emission points 1 thru 5 in order to better dispersion characteristics. This will be performed during the notice of this permit in the Environmental Notice Bulletin. No other changes in facility operation will occur.

A cap for VOC's, total HAP's and individual HAP's to below Title V thresholds are also included in the permit. Compliance is determined by maintaining usage records and MSDS sheets. NO MACT, PSD NSR or NSPS regulations apply to this facility.

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By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: DAVID S DENK
 DIVISION OF ENVIRONMENTAL PERMITS
 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 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 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(a)

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.

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

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Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

****** 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

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: DERRICK MANUFACTURING CORP

590 DUKE ROAD

BUFFALO, NY 14225-5102

Facility:

DERRICK MANUFACTURING CORP

590 DUKE ROAD

CHEEKTOWAGA, NY 14225

Authorized Activity By Standard Industrial Classification Code:

3532 - MINING MACHINERY



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 21 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 5 6NYCRR 200.7: Maintenance of equipment
- 9 6NYCRR 201-1.7: Recycling and Salvage
- 10 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the Air
- 12 6NYCRR 201-3.2(a): Proof of Eligibility
- 13 6NYCRR 201-3.3(a): Proof of Eligibility
- 18 6NYCRR 202-1.1: Required emissions tests
- 19 6NYCRR 211.3: Visible emissions limited.
- 1 6NYCRR 200.1: Definitions Applicable To This Permit
- 2 6NYCRR 200.3: False statement
- 3 6NYCRR 200.5: Sealing
- 4 6NYCRR 200.6: Acceptable ambient air quality
- 6 6NYCRR 201-1.2: Unpermitted Emission Sources
- 7 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
- 8 6NYCRR 201-1.5: Emergency Defense
- 11 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 14 6NYCRR 201-7.2: Facility Permissible Emissions
- *15 6NYCRR 201-7.2: Compliance Demonstration
- *16 6NYCRR 201-7.2: Compliance Demonstration
- *17 6NYCRR 201-7.2: Compliance Demonstration
- 20 6NYCRR 212.6(a): Compliance Demonstration
- 22 6NYCRR 226.2: General requirements
- 23 6NYCRR 228.10: Handling, storage, and disposal of volatile organic compounds

Emission Unit Level

EU=E-00001

- 24 6NYCRR 212.9(b): Compliance Demonstration
- 25 6NYCRR 228.3(a): volatile organic compound emission control requirements
- 26 6NYCRR 228.5(a): Compliance Demonstration

EU=E-00001,Proc=001

- 27 6NYCRR 212.4(c): Compliance Demonstration
- 28 6NYCRR 228.7: coating lines for miscellaneous metal parts and products - extreme performance coatings

EU=E-00001,Proc=002

- 29 6NYCRR 212.4(c): Compliance Demonstration

EU=E-00002

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30 6NYCRR 212.9(b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

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32 6NYCRR 201-5: Permit Exclusion Provisions

33 6NYCRR 201-5: Emission Unit Definition

34 6NYCRR 201-5.3(b): Contaminant List

35 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

36 6NYCRR 201-5: Emission Point Definition By Emission Unit

37 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping. 3556 - FOOD PRODUCTS

MACHINERY

Permit Effective Date: 02/05/2001

Permit Expiration Date: No expiration date.

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FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 21: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 21.1:

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.

Condition 5: Maintenance of equipment
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 5.1:

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

Condition 9: Recycling and Salvage
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 9.1:

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.

Condition 10: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 10.1:

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.

Condition 12: Proof of Eligibility
Effective between the dates of 02/05/2001 and Permit Expiration Date

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Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 12.1:

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.

Condition 13: Proof of Eligibility

Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 13.1:

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.

Condition 18: Required emissions tests

Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 18.1:

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.

Condition 19: Visible emissions limited.

Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 19.1:

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-



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minute period per hour of not more than 57 percent opacity.

Condition 1: Definitions Applicable To This Permit
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.1

Item 1.1:

The definitions found in Parts 200 and 201 apply throughout this permit. Specific definitions used in this permit and their meanings include:

1. "Act" refers to the Federal Clean Air Act, 42 U.S.C. Section 7401, et seq., as amended by Public Law 101-549, November 15, 1990.
2. "Administrator" refers to the Administrator of the United States Environmental Protection Agency or designee.
3. "Department" refers to the New York State Department of Environmental Conservation.

CFalse statement

Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.3

Item 2.1:

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 3: Sealing
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 3.1:

- (a) 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 labelling 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.
- (b) 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.
- (c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any

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contamination source in accordance with this section

Condition 4: **Acceptable ambient air quality**
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 4.1:

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

Condition 6: **Unpermitted Emission Sources**
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 6.1:

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.

Condition 7: **Unavoidable Noncompliance and Violations**
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.4

Item 7.1:

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 or certificate issued for the corresponding air contamination source. Such reports shall describe why the



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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.

(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.

Condition 8: Emergency Defense
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal/6NYCRR 201-1.5

Item 8.1:

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



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(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.

Condition 11: Public Access to Recordkeeping
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable 6NYCRR 201-1.10(a)

Item 11.1:

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.

Condition 14: Facility Permissible Emissions
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal 6NYCRR 201-7.2

Item 14.1:

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: 000078-93-3 PTE: 19,000 pounds per year
Name: METHYL ETHYL KETONE

CAS No: 0NY100-00-0 PTE: 49,000 pounds per year
Name: HAP

CAS No: 0NY998-00-0 PTE: 99,000 pounds per year
Name: VOC

Condition 15: Compliance Demonstration
Effective between the dates of 02/05/2001 and Permit Expiration Date



Applicable Federal Requirement: 6NYCRR 201-7.2

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The following condition "CAPS" the facility volatile organic compound (VOC) emissions below the applicability threshold of 50 tons per year for a title V permit. The facility shall not exceed a total emission rate of 99000 pounds per year of VOC's based on a 12 month rolling average as determined by summing the individual VOC emissions from all coatings, solvents and any other possible source of VOC. Paint VOC content will be determined from material safety data sheets that must be maintained up to date, on site and available for inspection. The department reserves the right to request analysis of any coating as applied. USEPA method 24 is the preferred reference test method for determining VOC content of coatings.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: VOC's

Parameter Monitored: VOC's

Upper Permit Limit: 99000 pounds per year

Reference Test Method: usepa method 24

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

Condition 16: Compliance Demonstration
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.2

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Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The following condition will "cap" the facility total Hazardous Air pollutant (HAP) to less than the title V applicability threshold of 25 tons/year .
The facility shall not exceed a total emission rate of 49000 pound per year of total HAP's based on a 12 month rolling average as determined by summing the individual monthly HAPS from all coatings, solvents and other possible sources of HAP's. Coating HAP content will be determined from material safety data sheets that must be maintained on site and made available for inspection. The departments "HAP list" as identified by NYSDEC air toxics section is attached to this permit. The department reserves the right to request analysis of any coating as applied. Appropriate USEPA methods for analysis must be used.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: HAP

Upper Permit Limit: 49000 pounds per year

Reference Test Method: usepa

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 1/30/2002.

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

Condition 17: Compliance Demonstration

Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal/State Regulations: 6NYCRR 201-7.2



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Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000078-93-3 METHYL ETHYL KETONE

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The following condition will "cap" the facility individual Hazardous Air Pollutant (HAP) to less than the title V applicability threshold of 10 tons per year. The facility shall not exceed a total emission rate of 19000 pounds per year of any individual HAP based on a 12 month rolling average as determined by calculating the individual monthly HAPS from all coatings, solvents and other possible sources of HAP's. Coating HAP content will be determined from material safety data sheets or equivalent that must be maintained on site and made available for inspection. The departments HAP list as identified by NYSDEC air toxics section is attached to this permit for reference. The department reserves the right to request analysis of any coating as applied. Appropriate USEPA methods of analysis must be used.

A HAP's list is attached to this permit for reference.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: HAP

Upper Permit Limit: 19000 pounds per year

Reference Test Method: usepa

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED WEEKLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

Condition 20: Compliance Demonstration

Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Fed6NYCRR 212.6(a)

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Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The maintenance procedure applicable to this permit for compliance with the opacity requirements under section 212.6(a) will include the following:

1. If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this may be zero percent opacity for many or all stacks), the facility owner shall determine the cause immediately and make the necessary correction. The facility owner and/or operator will observe all emission points or other sources of air pollution daily during daylight hours to monitor for unusual opacity conditions. The records of these observations will be recorded in a bound log book at the facility and shall be available for inspection by Department representatives upon request. Records will be maintained for a period of at least five years.
2. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the facility owner will conduct a Method 9 assessment to determine the degree of opacity.
3. If the opacity is determined to exceed the limits of section 212.6(a), the facility will be determined to be in violation, will remedy the problem, and will contact the Department. The provisions of Part 201-1.4 shall apply.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 22)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 22: General requirements

Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 226.2

Item 22.1:



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No person shall conduct solvent metal cleaning unless:

- (1) Solvent is stored in covered containers and waste solvent is transferred or disposed of in such a manner that less than 20 percent of the waste solvent, by weight, can evaporate into the atmosphere;
- (2) Equipment used in solvent metal cleaning is maintained to minimize leaks and fugitive emissions;
- (3) Equipment used in solvent metal cleaning displays a conspicuous summary of proper operating procedures consistent with minimizing emissions of volatile organic compounds; and
- (4) Equipment covers are closed when the solvent metal cleaning unit is not in service.
- (5) A record of solvent consumption shall be maintained for each year and made available to the commissioner or his representative upon request.

Condition 23: Handling, storage, and disposal of volatile organic compounds
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Feder6NYCRR 228.10

Item 23.1:

No owner or operator of a facility subject to 6NYCRR Part 228 shall:

- (a) use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup, or coating removal;
- (b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup, or coating removal;
- (c) use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere;
- (d) 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; or
- (e) use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

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

Condition 24: Compliance Demonstration
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Fed6NYCRR 212.9(b)

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00001

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Regulated Contaminant(s):
CAS No:PARTICULATES

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The degree of air cleaning required for particulate matter emissions is determined by Table 2 of 212.9(b), as defined by emission rate potential.

Manufacturer Name/Model Number: binks AF filter or equivalent

Parameter Monitored: PARTICULATES

Upper Permit Limit: 96 percent reduction by weight

Monitoring Frequency: PER SHIFT

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

Condition 25: volatile organic compound emission control requirements
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Fed6NYCRR 228.3(a)

Item 25.1:

This Condition applies to Emission Unit: E-00001

Item 25.2:

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2 of Part 228, unless an approved coating system or approved control equipment is utilized or a variance

has been granted.

Condition 26: Compliance Demonstration
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00001

Item 26.2:



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Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27:

Compliance Demonstration

Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00001

Process: 001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operators of all paint spray booths must periodically monitor the booths and the accompanying particulate control device(s) by completing the following tasks on a weekly basis:

- Inspect the spray booth emission point for evidence of paint fallout and for presence of visible emissions. Presence of visible emissions indicates that the emission

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sources may not be operating properly and may need servicing.

- Inspect the spray booth's particulate control device for evidence that maintenance or replacement is needed.
- Record in an inspection log, which shall be made available for Department review upon request, the following information: Date, time, name of staff person performing inspection, and inspection results for each inspection; and, whenever a problem is discovered, a description of the problem, cause and corrective action taken.

Regardless of when a problem is noted, i.e., at a time other than during the weekly inspection, it must be immediately remedied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 28: coating lines for miscellaneous metal parts and products - extreme performance coatings
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Item 28.1:

This Condition applies to Emission Unit: E-00001
Process: 001

Item 28.2:

The maximum pounds of volatile organic compounds per gallon (minus water and excluded VOC) at coating lines for miscellaneous metal parts and products, extreme performance coatings, shall not exceed 3.5 lbs/gal at application.

Condition 29: Compliance Demonstration
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00001

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Process: 002

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 29.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

STATOR OVEN WILL ONLY BE OPERATED WHEN
ELECTROSTATIC PRECIPITATOR IS
OPERATIONAL. EQUIPMENT WILL BE OPERATED
AND MAINTAINED IN ACCORDANCE WITH
MANUFACTURERS SPECIFICATIONS.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 30: Compliance Demonstration

Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable Fed6NYCRR 212.9(b)

Item 30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-00002

Regulated Contaminant(s):

CAS No: 007439-92-1 LEAD

Item 30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

LEAD EMISSIONS ARE MAINTAINED AT A LEVEL
OF LESS THAN 1.0 LB/HR. THIS IS A SMALL 2
CU FT POT FOR MAKING BALANCING WEIGHTS.

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MAINTAIN TEMPERATURE JUST ABOVE MELTING
POINT AND SLAG ON TOP OF LIQUID LEAD WILL
MINIMIZE VAPORS.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Parameter Monitored: LEAD

Upper Permit Limit: 1.0 pounds per hour

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT
ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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



STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 31: General Provisions
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable State 6NYCRR 201-5

Item 31.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 31.2:

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.

Item 31.3:

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.

Condition 32: Permit Exclusion Provisions
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 32.1:

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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 by the Department and the receipt thereof by the Applicant does not supercede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements



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contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

Condition 33: Emission Unit Definition
Effective between the dates of 02/05/2001 and Permit Expiration Date

Applicable State R6NYCRR 201-5

Item 33.1:

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

Emission E-00001

Emission Unit Description:

THE FACILITY'S MAIN PAINT AND COATINGS SPRAYING AND DRYING AREA CONTAINS FIVE PAINT SPRAY BOOTHS AND AN INFRARED OVEN (USED FOR PAINT DRYING AND CURING). THESE ARE UTILIZED IN THE SPRAY PAINTING USING COMPLIANCE COATINGS OF VARIOUS ITEMS (BOTH PARTS AND FINISHED PRODUCTS) MANUFACTURED AT THE DERRICK FACILITY. IT ALSO INCLUDES A STATOR BAKING OVEN. THE STATOR BAKING OVEN IS 30 CU FT IN SIZE AND OPERATES AT 325 DEGREES F WITH A POLYSTAGE PRECIPITATOR TO REMOVE OIL MIST FROM THE EXHAUST. 4 OF THE PAINT BOOTHS ARE EQUIPPED WITH AIRLESS SPRAY GUNS OPERATING AT 60 POUNDS OF PRESSURE FOR ATOMIZATION. THE FIFTH BOOTH CONTAINS A CONVENTIONAL AIR ASSISTED GUN FOR APPLICATION OF THE ZINC CHROMATE PRIMER. MOST OF THE TOP COAT USED IS A CATALYZED ENAMEL PAINT, SOME EQUIPMENT ARE COATED WITH A TWO COMPONENT EPOXY PAINT. THIS TWO PART URETHANE COATING CALLED VIBRABOND 500 IS HEATED, PART A TO 170 F AND PART B TO 110 F. THE EMISSIONS FROM EMISSION POINTS 1 THRU 5

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WERE EVALUATED USING AIR GUIDE 1 FOR MDI, TDI AND ZINC CHROMATE EMISSIONS. THE ACTUAL POUNDS PER HOUR EMISSIONS ARE 0.0047, 0.143, AND 0.0094 RESPECTIVELY. THE PARTICULATE CONTROL EQUIPMENT IS WITH BINKS ANDREAL 29-359 PAINT BOOTH FILTERS OR EQUIVALENT WITH A RATED EFFICIENCY OF 97%. THE RESULTS OF THE AIR GUIDE I ANALYSIS REQUIRES THAT THE STACK HEIGHT BE INCREASED TO 15 FEET ABOVE THE ROOF OF THE BUILDING.

Building(s): MAIN

Item 33.2:

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

Emission Unit: E-00002

Emission Unit Description:

LEAD IS MELTED IN A LEAD POT FOR UTILIZATION IN THE MANUFACTURING PROCESS (PROVIDE PROPER WEIGHT FOR VIBRATING MOTOR). 2 CU. FT. IN SIZE. NOT USED OFTEN. PROPER TEMPERATURE AND POT SLAG LIMIT EMISSIONS.

Building(s): MAIN

Condition 34:

Contaminant List

Effective between the dates of 02/05/2001 and Permit Expiration Date

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

Item 34.1:

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

CAS No: 0NY100-00-0

Name: HAP

CAS No: 007439-92-1

Name: LEAD

CAS No: 000078-93-3

Name: METHYL ETHYL KETONE

CAS No: 0NY075-00-0

Name: PARTICULATES

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Emission S00005 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00006 - Control
Control Type: MAGNESIUM OXIDE SCRUBBING

Emission Source/Control: 00010 - Process

Item 37.2:

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

Emission Unit: E-00001
Process: 002
Source Classification Code: 4-02-008-03
Process Description: AN OVEN IS UTILIZED TO DRY AND BAKE STATORS.

Emission Source/Control: 00007 - Control
Control Type: ELECTROSTATIC PRECIPITATOR

Emission S00020 - Process