

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1442-00040/02003

Mod 0 Effective Date: 08/28/2015 Expiration Date: 08/27/2020

Mod 1 Effective Date: 01/29/2018 Expiration Date: 08/27/2020

Permit Issued To:MOOG INC

400 JAMISON RD

EAST AURORA, NY 14052-0018

Contact: MERI SCAPPATURA

MOOG INC

SENECA ST & JAMISON RD EAST AURORA, NY 14052

(716) 687-4476

Facility: MOOG INC

SENECA ST. JAMISON RD & CONLEY RD

ELMA, NY 14059-0018

Description:

This facility specializes in the design and manufacture of high-performance motion control systems for military and commercial aircraft, satellites and space and defense hardware, industrial machinery, energy industry machinery, marine applications, and medical equipment. Many activities take place at specially designed stations performed by one or two people. The resulting emissions are typically not directly vented; but rather are mixed with comfort cooling and heating of the process area and returned to the building for makeup air. Particulates are captured in HVAC filtration systems and any other emissions are minimal and exempt.

This significant permit modification addresses Moog's request for a Volatile Organic Compounds (VOC) Reasonably Available Control Technology (RACT) variance. A lesser degree of control has been established per Part 226.5 for the use of isopropyl alcohol within customized solvent spray hoods used to clean high precision motion control parts at Moog Inc. Moog submitted a detailed VOC RACT analysis which successfully demonstrated the technical and economic infeasibility of controlling VOC emissions from the use of isopropyl alcohol within the customized solvent spray hoods. The economic feasibility analysis for the various options showed a cost of control of at least \$12,000 per ton which is more than twice the cost feasibility threshold.

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To maintain compliance with the VOC RACT requirement, the facility shall limit VOC emissions from the usage of isopropyl alcohol within the customized solvent spray hoods used to clean high precision motion control parts to less than 3 gallons per day per source on an annual basis. Emissions subject to this RACT requirement shall be calculated using a combination of material usage and production records of material processed by the equipment. Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request.

The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved RACT evaluation. The first re-evaluation will be due no later than five years from the pertinent permit modification issuance date.

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 14203-2915

Authorized Signature: ______ Date: ___/ ___/ ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department Relationship of this Permit to Other Department Orders and Determinations

Applications for permit renewals, modifications and transfers
Applications for permit renewals, modifications and transfers
Permit modifications, suspensions or revocations by the Department
Facility Level

Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



Facility DEC ID: 9144200040

DEC GENERAL CONDITIONS **** General Provisions ****

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by

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the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 1-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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.

Item1-1.2:

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

Item 1-1.3

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

Condition 4: Permit modifications, suspensions or revocations by the Department Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

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

**** Facility Level ****

Condition 5: Submission of application for permit modification or renewal-REGION 9
HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to: NYSDEC Regional Permit Administrator

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Region 9 Headquarters Division of Environmental Permits 270 Michigan Avenue Buffalo, NY 14203-2915 (716) 851-7165



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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400 JAMISON RD

EAST AURORA, NY 14052-0018

Facility: MOOG INC

SENECA ST, JAMISON RD & CONLEY RD

ELMA, NY 14059-0018

Authorized Activity By Standard Industrial Classification Code:

3492 - FLUID POWER VALVES AND HOSE FITTINGS

Mod 0 Permit Effective Date: 08/28/2015 Permit Expiration Date: 08/27/2020

Mod 1 Permit Effective Date: 01/29/2018 Permit Expiration Date: 08/27/2020



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LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources Proof of Eligibility
- 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 1-1 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 23 6 NYCRR 201-6.4 (f): Compliance Certification
- 24 6 NYCRR 211.1: Air pollution prohibited
- 25 6 NYCRR 212.4 (c): Compliance Certification
- 26 6 NYCRR 212.6 (a): Compliance Certification
- 1-2 6 NYCRR 226.5: Compliance Certification
- 27 6 NYCRR 228-1.3 (a): Compliance Certification
- 28 6 NYCRR 228-1.3 (b) (1): Compliance Certification
- 29 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 30 6 NYCRR 228-1.3 (d): Compliance Certification
- 31 6 NYCRR 228-1.3 (e): Surface coating application requirments
- 32 6 NYCRR 228-1.3 (e) (2): Compliance Certification
- 33 6 NYCRR 228-1.5 (e): Compliance Certification
- 34 40CFR 63.11177, Subpart HHHHHH: Compliance Certification
- 35 40CFR 63.11178, NESHAP Subpart HHHHHH: Compliance Certification
- 36 40CFR 63, Subpart ZZZZ: Applicability
- 37 40CFR 63, Subpart ZZZZ: Engines at Area sources of HAP

Emission Unit Level

- 38 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 39 6 NYCRR Subpart 201-6: Process Definition By Emission Unit



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- 40 40CFR 60, NSPS Subpart IIII: Compliance Certification
- 41 40CFR 60, NSPS Subpart JJJJ: Compliance Certification
- 42 40CFR 63, Subpart ZZZZ: Compliance Certification

EU=0-00003

- 1-3 6 NYCRR Part 226: Compliance Certification
- 44 6 NYCRR 226.5: Compliance Certification

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- 45 40CFR 63.11507(e), Subpart WWWWWW: Compliance Certification
- 46 40CFR 63.11507(e), Subpart WWWWWW: Compliance Certification
- 47 40CFR 63.11507(g), Subpart WWWWWW: Compliance Certification
- 48 40CFR 63.11507(g), Subpart WWWWWW: Compliance Certification

EU=0-00006

- 49 40CFR 63, Subpart HHHHHHH: Compliance Certification
- 50 40CFR 63.11173(a), Subpart HHHHHH: Compliance Certification
- 51 40CFR 63.11173(c), Subpart HHHHHH: Compliance Certification

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52 6 NYCRR 212.9 (b): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS Facility Level

- 53 ECL 19-0301: Contaminant List
- 54 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and

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reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: Property Rights - 6 NYCRR 201-6.4 (a) (6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: Severability - 6 NYCRR 201-6.4 (a) (9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item I: Permit Shield - 6 NYCRR 201-6.4 (g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V



facility for any violation of applicable requirements prior to or at the time of permit issuance;

- iii. The applicable requirements of Title IV of the Act:
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item J: Reopening for Cause - 6 NYCRR 201-6.4 (i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the department pursuant to the provisions of section 201- 6.6 of this Subpart.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

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

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

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

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 200.6

Item 1.1:

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



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contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 201-6.4 (a) (7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and Reporting of Compliance Monitoring

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii)The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

Condition 4: Records of Monitoring, Sampling, and Measurement

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all



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reports required by the permit.

Condition 5: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements,



the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. 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.

Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual



report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR) Reports due 30 days after the reporting period. The initial report is due 1/30/2016. Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
- the identification of each term or condition of the permit that is the basis of the certification;
- the compliance status;
- whether compliance was continuous or intermittent;
- the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
- such other facts as the Department may require to determine the compliance status of the facility as



specified in any special permit terms or conditions; and

- such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.
- iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section USEPA Region 2 Air Compliance Branch 290 Broadway New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer NYSDEC Region 9 Headquarters 270 Michigan Avenue Buffalo, NY 14203-2915

The address for the BQA is as follows:

NYSDEC



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Bureau of Quality Assurance 625 Broadway Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due on the same day each year

Condition 7: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR) Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 202-2.5

Item 8.1:

- (a) The following records shall be maintained for at least five years:
 - (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.
- (b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires - Prohibitions

Effective between the dates of 08/28/2015 and 08/27/2020



Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

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

Item 9.2

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

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.



Permit ID: 9-1442-00040/02003 Facility DEC ID: 9144200040

SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 200.7

Item 10.1:

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 11: Recycling and Salvage

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 201-1.7

Item 11.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 201-1.8

Item 12.1:

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 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 13.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.



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Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 14.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 15: Requirement to Provide Information

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 201-6.4 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 1-1: Right to Inspect

Effective between the dates of 01/29/2018 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 201-6.4 (a) (8)

Item 1-1.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.



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Condition 16: Right to Inspect

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 201-6.4 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Off Permit Changes

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 17.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

- (i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 18: Required Emissions Tests



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Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 202-1.1

Item 18.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 19: Accidental release provisions.

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40 CFR Part 68

Item 19.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
- 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
- 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center C/O CSC 8400 Corporate Dr Carrollton, Md. 20785

Condition 20: **Recycling and Emissions Reduction**

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement:40CFR 82, Subpart F

Item 20.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.



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Condition 21: Emission Unit Definition

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 21.1(From Mod 1):

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

Emission Unit: 0-00003 Emission Unit Description:

This emission unit is comprised of the facility-wide VOC emissions which come from many small emission sources. Most of these emission sources by themselves could be exempted based on DEC minor source exemption rules (NYCRR Part 201-3.2). Combined, the facility-wide PTE for VOC emissions is calculated to be over 50 tons triggering this

Emissions resulting from paint booth operations with three (3) paint booths and one (1) dip tank are not included in this emission unit, but are part of emission unit U-000006.

This emission unit includes some sources, such as non-destructive inspection or testing using liquid penetrants, drying/curing of paints, adhesives, coatings, and forming/curing of cables, that also emit small amounts of hazardous air pollutants (HAPs) as defined by 6 NYCRR 200.1.

Building(s): 11

Title V permit.

17

2

20

24

3

Item 21.2(From Mod 0):

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

Emission Unit: 0-00001

Emission Unit Description:

Facility-wide combustion sources including emergency generators, boilers, furnaces, and stationary engines. All sources are exempt from permitting per various exemptions under Part 201-3.2(c)(1)-(7).

Item 21.3(From Mod 0):

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

Emission Unit: 0-00002

Emission Unit Description:

Facility-wide PM & PM-10 emission sources with emissions calculated using the total amount of dust collected from



all dust control equipment and cooling towers. PM Emissions resulting from paint booth operations with three (3) paint booths and one (1) dip tank are not included in this emission unit, but are part of emission unit U-000006.

This emission unit includes some sources, such as electron beam welding machines, metal cutting and laser engravers, that also emit small amounts of hazardous air pollutants (HAPs) as defined by 6 NYCRR 200.1.

Building(s): 17

20

24

Item 21.4(From Mod 0):

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

Emission Unit: 0-00004 **Emission Unit Description:**

> Facility-wide soldering operation with many hand held soldering stations, wave soldering, and selective solder machines. A conservative 0.005 lb/lb lead emission rate is used to calculate Lead Oxide emissions from this operation due to the widespread nature of the emission points and the fact that each emission point is made up of small equipment, sometimes handheld which are exempt emission sources per Part 201-3.3(c)(54).

Building(s): 20

Item 21.5(From Mod 0):

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

Emission Unit: 0-00005 **Emission Unit Description:**

> Moog operates a non-electrolytic metal coating operation consisting of a chromate conversion coating plating line that contains the metal HAP, chromium. There are two tanks that contain chromium. Since the baths are operated at room temperature, there are no known emission factors found to quantify any potential emissions from this source. If there is no tank turbulence, it is reasonable to assume that there are no emissions (other than water vapor) because little or no volatile materials are in the process tanks. Since both tanks employ non-electrolysis plating, the standards and management practices that apply to these tanks are found at 63.11507(g) of 40CFR63 Subpart wwwwww.

Item 21.6(From Mod 0):

The facility is authorized to perform regulated processes under this permit for: Emission Unit: 0-00006



Emission Unit Description:

Paint booth operations with three (3) paint booths and one (1) dip tank. Each spray booth is fitted with a type of filter technology that is demonstrated to achieve at least a 98% capture of paint overspray, and utilizes HVLP guns with at least 65% transfer efficiency. Since methylene chloride is used in the dip tank, the facility must comply with 40CFR63 Subpart HHHHHHH, NESHAP for Paint Stripping & Miscellaneous Surface Coating Operations at area sources.

Most coatings used by Moog comply with the volatile organic compounds (VOC) content limits as required by Subpart 228-1, however, some coatings may be used that do not meet the limits because of military, aerospace, and/or government contractual requirements. For this reason, Moog, Inc. submitted a detailed analysis dated September 4, 2013, completed in accordance with the "NYSDEC DAR-20 Economic and Technical Analysis for Reasonably Available Control Technology (RACT)" policy, in a process specific RACT demonstration per 6NYCRR Part 228-1.5(e).

The RACT analysis successfully demonstrated the economic infeasibility of controlling VOC emissions from certain emission sources within the miscellaneous metal parts (Class B) and aerospace (Class E) coating line categories.

Building(s): 24

Item 21.7(From Mod 0):

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

Emission Unit: 0-00007 Emission Unit Description:

This emission unit consists of a wastewater evaporator used mainly to evaporate wash waters since the facility is not serviced by a municipal sewer system. Spent aqueous parts washer solutions, which may contain detergents with small amounts of volatile organic compounds (VOCs), are also processed in the wastewater evaporator.

Building(s): 2

Item 21.8(From Mod 0):

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

Emission Unit: 0-00008 Emission Unit Description:

Moog has a chemical cleaning operation which consists of numerous tanks for metal parts that uses various strong acids, including hydrochloric acid, to remove surface imperfections such as embedded iron, oxides, heat tint stains, inorganic contaminants, rust or scale.



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Hydrochloric acid is a Hazardous Air Pollutant (HAP) as defined by 6 NYCRR 200.1.

Building(s): 11

Condition 22: Progress Reports Due Semiannually

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 201-6.4 (d) (4)

Item 22.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 23: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 23.1:

The Compliance Certification activity will be performed for the Facility.

Item 23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Operational Flexibility Plan

I. Protocol Objective

The objective of this condition is to maximize operational flexibility at the facility by building into the Title V permit the capability to make certain changes using a protocol. As provided under 6 NYCRR Part 201-6.4(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.6.

- II. Protocol
- A. Criteria
- 1. Changes reviewed under this protocol shall be



evaluated in accordance with the following criteria:

- a. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.
- b. Any new or changed emission source shall not be part of a source project that results in a significant net emissions increase that exceeds the New Source Review (NSR) thresholds identified in 6 NYCRR Part 231.
- c. The facility shall not use the protocol to make physical changes or changes in the method of operation of existing emissions sources that would require a new or modified federally enforceable cap either to avoid major NSR requirements or to address and comply with other Clean Air Act requirements, such as RACT. Such changes must be addressed via the significant permit modification provisions.
- B. Notification Requirements for Changes Reviewed under the Protocol
- 1. The facility shall notify the Department in writing of the proposed change.
- 2. Notifications made in accordance with this protocol will include the following documentation:
- a. Identification of the Title V permit emission unit, process(es), emission sources and emission points affected by the proposed change with applicable revisions to the Emission Unit structure;
- b. Description of the proposed change, including operating parameters;
- c. Identification and description of emissions control technology;
- d. Documentation of the project's, or emission source's, compliance with respect to all state and/or federally applicable requirements, including the following steps:
- i. Calculate the emission rate potential and maximum projected actual annual emission rates for all



contaminants affected by the change.

- ii. Submit documentation of major NSR program non-applicability for NYSDEC review and approval.
- iii. Identify and evaluate the applicability of all regulations likely to be triggered by the new or changed emission source.
- iv. Propose any operating and record keeping procedures necessary to ensure compliance.
- e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.
- C. Review and Approval of Changes
- 1. The Department shall respond to the permittee in writing with a determination within 15 days of receipt of the notification of the permittee.
- 2. The Department may require a permit modification, in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to notification do not meet the criteria under II. A above or that the changes may have a significant air quality impact or be otherwise potentially significant under SEQRA (6 NYCRR Part 617).
- 3. The Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.
- D. Additional Compliance Obligations for Changes Made Under this Protocol
- 1. Upon commencement of the change, the facility shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with II.A.1.a above.
- 2. The facility shall provide with the semi-annual monitoring report, a summary of the changes made in accordance with this protocol and a statement of the compliance status of each. Changes reported should



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include all those made during the corresponding period and any earlier changes that have not yet been incorporated into the permit.

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 1/30/2016.

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

Condition 24: Air pollution prohibited

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 211.1

Item 24.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 25: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted by the facility at the request of the Department.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.050 grains per dscf Reference Test Method: EPA Method 5



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 26: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Item 26.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the facility on a monthly basis. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 6NYCRR Part 212.6(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and



corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Monitoring Frequency: MONTHLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 22) Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 1-2: Compliance Certification

Effective between the dates of 01/29/2018 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 226.5

Item 1-2.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-2.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

A lesser degree of control has been established per Part 226.5 for the customized isopropyl alcohol (IPA) solvent spray hoods that Moog uses to clean high precision motion control parts that it manufactures for customers. These metal parts are used for aerospace applications, but are also used by the Defense Department in tanks and other military vehicles, and therefore do not qualify for the current special and extreme solvent metal cleaning exemption under 6NYCRR 226.3(a)(4)(i) for aerospace service, as defined at 6NYCRR 226.1(b)(9)(i).

Moog submitted a detailed Volatile Organic Compounds (VOC) Reasonably Available Control Technology (RACT) analysis dated September 25, 2017 which was completed in accordance with the "NYSDEC DAR-20 Economic and Technical Analysis for Reasonably Available Control Technology (RACT)" policy and 6NYCRR Part 226.5. The RACT analysis successfully demonstrated the technical and economic infeasibility of controlling VOC emissions from the use of isopropyl alcohol within the customized solvent spray hoods used to clean high precision motion control parts via

- 1.) utilizing a compliant solvent,
- 2). utilizing demonstrated and proven emission control technologies which would achieve the required overall removal efficiency of 90%;
- 3.) utilizing demonstrated and proven emission control technologies which would achieve a level of overall



removal efficiency less than the required level of 90%; and

4.) utilizing demonstrated and proven production modification methods which would result in real, documented and enforceable reductions in the VOC emissions from the process.

The economic feasibility analysis for the various options showed a cost of control of at least \$12,000 per ton which is more than twice the cost feasibility threshold.

To maintain compliance with the process-specific VOC RACT requirement, the facility shall limit VOC emissions from the usage of isopropyl alcohol within the customized solvent spray hoods used to clean high precision motion control parts to less than 3 gallons per day per source on an annual basis. Emissions subject to this RACT requirement shall be calculated using a combination of material usage and production records of material processed by the equipment.

Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request.

The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved RACT evaluation. The first re-evaluation will be due no later than five years from the pertinent permit modification issuance date.

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 7/30/2018. Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Item 27.2:

Compliance Certification shall include the following monitoring:

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



Monitoring Description:

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

The permittee will conduct observations of visible emissions from the facility on a monthly basis. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 6NYCRR Part 228-1.3(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Monitoring Frequency: MONTHLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 22) Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 28: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Item 28.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

- 1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
- 2. Purchase, usage and/or production records of each coating material, including solvents.
- 3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
- 4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
- 5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR) Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 29: Surface Coating- Prohibitions
Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 29.1:

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



- (i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;
- (ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and
- (iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).
- (2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Condition 30: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Item 30.2:

Compliance Certification 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 Subpart must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with volatile organic compounds (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) clean hand held spray guns 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.

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 1/30/2016.

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

Condition 31: Surface coating application requirments
Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 31.1:

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

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;
- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;

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(vii) airless spray, (including air assisted);



(viii) airbrush application methods for stenciling, lettering, and other identification markings; or

(ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

Condition 32: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

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

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

A facility containing a coating line (other than a class A coating line) may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4; provided such use is recorded on an as used basis and maintained at the facility for a period of five years.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 33: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 228-1.5 (e)

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Most coatings used by Moog comply with the volatile organic compounds (VOC) content limits as required by Subpart 228-1, however, some coatings may be used that do not meet the limits because of military, aerospace, and/or government contractual requirements. For this reason, Moog, Inc. submitted a detailed analysis dated September



4, 2013, completed in accordance with the "NYSDEC DAR-20 Economic and Technical Analysis for Reasonably Available Control Technology (RACT)" policy, in a process specific RACT demonstration per 6NYCRR Part 228-1.5(e).

The RACT analysis successfully demonstrated the economic infeasibility of controlling VOC emissions from certain emission sources within the miscellaneous metal parts (Class B) and aerospace (Class E) coating line categories. These emission sources have potential VOC emissions of 5 tons per year, with actual VOC emissions totaling less than 3 tons per year. Comparatively, facility-wide VOC emissions come from many small emission sources, most of which are exempt sources. The facility-wide potential VOC emission is 65 tons per year, and actual VOC emissions total 36 tons per year. Since the potential emissions from these sources is relatively small, a large (nearly \$100,000 per ton) cost of VOC control was calculated within the RACT analysis. Thus, even though the RACT analysis showed that even though it is technically feasible to control VOC emissions, it is economically infeasible to control the VOC emissions from these sources.

In order to maintain compliance with 6 NYCRR Part 228-1 VOC RACT requirements, Moog will maintain documentation of the reason(s) why compliant coatings were not used, and records documenting the total annual emissions of VOC from non-compliant coatings used/purchased within these emission sources on a rolling 12-month basis.

Prior to the addition of new sources using non-compliant coatings and/or the addition of new non-compliant coatings, Moog must evaluate whether the proposed changes are large enough to alter the outcome of the previous process specific RACT demonstration.

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 1/30/2016.

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

Condition 34: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63.11177, Subpart HHHHHH



Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) below. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) below, as applicable.

- (a) Certification that each painter has completed the training specified in § 63.11173(f) with the date the initial training and the most recent refresher training was completed.
- (b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in § 63.11173(e)(3)(i).
- (c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in § 63.11173(e)(4).
- (d) Copies of any notification submitted as required by § 63.11175 and copies of any report submitted as required by § 63.11176.
- (e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).
- (f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates



to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in § 63.11173, § 63.11174, § 63.11175, or § 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 35: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63.11178, NESHAP Subpart

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Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

If you are the owner or operator of an affected source, you must maintain copies of the records specified in § 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 36: Applicability

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63, Subpart ZZZZ

Item 36.1:



New York State Department of Environmental Conservation

Permit ID: 9-1442-00040/02003 Facility DEC ID: 9144200040

Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 subpart ZZZZ.

Condition 37: Engines at Area sources of HAP

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63, Subpart ZZZZ

Item 37.1:

Internal combustion engines, constructed or re-constructed on or after June 12, 2006, that meet the requirements of 40 CFR 60 Subpart IIII or Subpart JJJJ meet the requirements of 40 CFR 63 Subpart ZZZZ.

**** Emission Unit Level ****

Condition 38: Emission Point Definition By Emission Unit

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 38.1(From Mod 0):

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

Emission Unit: 0-00002

Emission Point: 02-47

Height (ft.): 30 Diameter (in.): 18

NYTMN (km.): 4745.568 NYTME (km.): 200.94 Building: 2

Emission Point: 17-23

Height (ft.): 12 Diameter (in.): 2

NYTMN (km.): 4745.524 NYTME (km.): 201.148 Building: 17

Emission Point: 20-15

Height (ft.): 36 Length (in.): 33 Width (in.): 33 NYTMN (km.): 4745.239 NYTME (km.): 202.094 Building: 20

Emission Point: 20-16

Height (ft.): 36 Diameter (in.): 2

NYTMN (km.): 4745.208 NYTME (km.): 202.084 Building: 20

Emission Point: 24-14

Height (ft.): 9 Diameter (in.): 6

NYTMN (km.): 4745.9 NYTME (km.): 200.137 Building: 24

Item 38.2(From Mod 0):

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



Emission Unit: 0-00003

Emission Point: 02-21

Height (ft.): 30 Length (in.): 21 Width (in.): 21 NYTMN (km.): 4745.57 NYTME (km.): 200.955 Building: 2

Emission Point: 02-29

Height (ft.): 30 Diameter (in.): 10

NYTMN (km.): 4745.578 NYTME (km.): 200.981 Building: 2

Emission Point: 02-31

Height (ft.): 13 Diameter (in.): 3

NYTMN (km.): 4745.568 NYTME (km.): 200.933 Building: 2

Emission Point: 02-36

Height (ft.): 26 Diameter (in.): 9

NYTMN (km.): 4745.572 NYTME (km.): 200.933 Building: 2

Emission Point: 02-37

Height (ft.): 30 Diameter (in.): 9

NYTMN (km.): 4745.606 NYTME (km.): 200.933 Building: 2

Emission Point: 02-42

Height (ft.): 30 Diameter (in.): 16

NYTMN (km.): 4745.582 NYTME (km.): 201.007 Building: 2

Emission Point: 02-51

Height (ft.): 30 Diameter (in.): 16

NYTMN (km.): 4745.59 NYTME (km.): 200.955 Building: 2

Emission Point: 03-01

Height (ft.): 13 Diameter (in.): 3

NYTMN (km.): 4745.554 NYTME (km.): 200.82 Building: 3

Emission Point: 03-13

Height (ft.): 25 Diameter (in.): 5

NYTMN (km.): 4745.554 NYTME (km.): 200.82 Building: 3

Emission Point: 03-15

Height (ft.): 30 Diameter (in.): 11

NYTMN (km.): 4745.584 NYTME (km.): 200.878 Building: 3

Emission Point: 11-13

Height (ft.): 30 Diameter (in.): 24

NYTMN (km.): 4745.514 NYTME (km.): 201.381 Building: 11

Emission Point: 11-14

Height (ft.): 12 Diameter (in.): 6

NYTMN (km.): 4745.452 NYTME (km.): 201.393 Building: 11

Emission Point: 11-15

Height (ft.): 12 Diameter (in.): 8

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NYTMN (km.): 4745.468	NYTME (km.): 201.361	Building: 11
Emission Point: 11-29 Height (ft.): 12 NYTMN (km.): 4745.49	Diameter (in.): 4 NYTME (km.): 201.421	Building: 11
Emission Point: 17-22 Height (ft.): 12 NYTMN (km.): 4745.508	Length (in.): 24 NYTME (km.): 201.138	Width (in.): 24 Building: 17
Emission Point: 20-01 Height (ft.): 36 NYTMN (km.): 4745.225	Length (in.): 32 NYTME (km.): 202.113	Width (in.): 32 Building: 20
Emission Point: 20-03 Height (ft.): 42 NYTMN (km.): 4745.225	Diameter (in.): 13 NYTME (km.): 202.113	Building: 20
Emission Point: 20-21 Height (ft.): 36 NYTMN (km.): 4745.235	Length (in.): 33 NYTME (km.): 202.019	Width (in.): 33 Building: 20
Emission Point: 20-24 Height (ft.): 36 NYTMN (km.): 4745.222	Length (in.): 33 NYTME (km.): 202.01	Width (in.): 33 Building: 20
Emission Point: 20-25 Height (ft.): 43 NYTMN (km.): 4745.269	Diameter (in.): 12 NYTME (km.): 202.	Building: 20
Emission Point: 20-29 Height (ft.): 40 NYTMN (km.): 4745.249	Diameter (in.): 12 NYTME (km.): 202.111	Building: 20
Emission Point: 20-50 Height (ft.): 33 NYTMN (km.): 4745.306	Diameter (in.): 4 NYTME (km.): 201.917	Building: 20
Emission Point: 20-51 Height (ft.): 36 NYTMN (km.): 4745.3	Diameter (in.): 6 NYTME (km.): 201.949	Building: 20
Emission Point: 20-52 Height (ft.): 35 NYTMN (km.): 4745.304	Diameter (in.): 4 NYTME (km.): 201.949	Building: 20
Emission Point: 20-57 Height (ft.): 34 NYTMN (km.): 4745.283	Diameter (in.): 4 NYTME (km.): 201.982	Building: 20
Emission Point: 20-58 Height (ft.): 38	Length (in.): 20	Width (in.): 20

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NYTMN (km.): 4745.259 NYTME (km.): 202.01 Building: 20

Emission Point: 24-04

Height (ft.): 7 Diameter (in.): 4

NYTMN (km.): 4745.899 NYTME (km.): 200.035 Building: 24

Emission Point: 24-05

Height (ft.): 7 Diameter (in.): 8

NYTMN (km.): 4745.896 NYTME (km.): 200.035 Building: 24

Emission Point: 24-06

Height (ft.): 12 Diameter (in.): 2

NYTMN (km.): 4745.963 NYTME (km.): 200.02 Building: 24

Emission Point: 24-12

Height (ft.): 9 Diameter (in.): 4

NYTMN (km.): 4746.118 NYTME (km.): 199.955 Building: 24

Emission Point: 24-13

Height (ft.): 9 Diameter (in.): 4

NYTMN (km.): 4746.181 NYTME (km.): 199.991 Building: 24

Emission Point: 24-16

Height (ft.): 9 Diameter (in.): 6

NYTMN (km.): 4745.966 NYTME (km.): 200.029 Building: 24

Item 38.3(From Mod 0):

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

Emission Unit: 0-00004

Emission Point: 00001

Height (ft.): 20 Diameter (in.): 8

NYTMN (km.): 4745.327 NYTME (km.): 201.922 Building: 20

Emission Point: 00002

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4745.327 NYTME (km.): 201.922 Building: 20

Emission Point: 00003

Height (ft.): 20 Diameter (in.): 6

NYTMN (km.): 4745.327 NYTME (km.): 201.922 Building: 20

Item 38.4(From Mod 0):

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

Emission Unit: 0-00006

Emission Point: 00006

Height (ft.): 24 Length (in.): 30 Width (in.): 48 NYTMN (km.): 4745.262 NYTME (km.): 201.126 Building: 24



Emission Point: 00007

Height (ft.): 24 Length (in.): 32 Width (in.): 32 NYTMN (km.): 4745.262 NYTME (km.): 201.126 Building: 24

Emission Point: 00008

Height (ft.): 24 Length (in.): 18 Width (in.): 18 NYTMN (km.): 4745.262 NYTME (km.): 201.126 Building: 24

Emission Point: 00009

Height (ft.): 24 Length (in.): 24 Width (in.): 12 NYTMN (km.): 4745.262 NYTME (km.): 201.126 Building: 24

Item 38.5(From Mod 0):

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

Emission Unit: 0-00007

Emission Point: 00004

Height (ft.): 20 Length (in.): 18 Width (in.): 18 NYTMN (km.): 4745.576 NYTME (km.): 200.988 Building: 2

Item 38.6(From Mod 0):

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

Emission Unit: 0-00008

Emission Point: 11-05

Height (ft.): 30 Length (in.): 18 Width (in.): 30 NYTMN (km.): 4745.479 NYTME (km.): 201.32 Building: 11

Emission Point: 11-08

Height (ft.): 35 Diameter (in.): 17

NYTMN (km.): 4745.479 NYTME (km.): 201.34 Building: 11

Emission Point: 11-09

Height (ft.): 35 Diameter (in.): 16

NYTMN (km.): 4745.474 NYTME (km.): 201.34 Building: 11

Condition 39: Process Definition By Emission Unit

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 39.1(From Mod 1):

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

Emission Unit: 0-00003

Process: 003 Source Classification Code: 3-09-001-98

Process Description:

The use of equipment facility-wide which generate VOC emissions, with the exception of three spray booths and one dip tank which are part of emission unit U-00006.

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Emission Source/Control: 00003 - Process

Emission Source/Control: 00032 - Process

Emission Source/Control: AC201 - Process

Emission Source/Control: EH201 - Process

Emission Source/Control: EH202 - Process

Emission Source/Control: EH203 - Process

Emission Source/Control: EH204 - Process

Emission Source/Control: EH205 - Process

Emission Source/Control: EH206 - Process

Emission Source/Control: EH207 - Process

Emission Source/Control: EH208 - Process

Emission Source/Control: EH209 - Process

Emission Source/Control: EH210 - Process

Emission Source/Control: EH211 - Process

Emission Source/Control: EH212 - Process

Emission Source/Control: EH213 - Process

Emission Source/Control: EH214 - Process

Emission Source/Control: EH215 - Process

Emission Source/Control: EH216 - Process

Emission Source/Control: EH217 - Process

Emission Source/Control: EH218 - Process

Emission Source/Control: EH219 - Process

Emission Source/Control: EH220 - Process

Emission Source/Control: EH301 - Process

Emission Source/Control: EV001 - Process

Emission Source/Control: NDI01 - Process



Emission Source/Control: NDI02 - Process

Emission Source/Control: OV111 - Process

Emission Source/Control: OV112 - Process

Emission Source/Control: OV201 - Process

Emission Source/Control: OV202 - Process

Emission Source/Control: OV203 - Process

Emission Source/Control: OV204 - Process

Emission Source/Control: OV2-1 - Process

Emission Source/Control: OV241 - Process

Emission Source/Control: OV242 - Process

Emission Source/Control: OV243 - Process

Emission Source/Control: OV244 - Process

Emission Source/Control: OV245 - Process

Emission Source/Control: OV301 - Process

Emission Source/Control: OV302 - Process

Emission Source/Control: SH111 - Process

Emission Source/Control: SH112 - Process

Emission Source/Control: SH171 - Process

Emission Source/Control: SH201 - Process

Emission Source/Control: SH202 - Process

Emission Source/Control: SH203 - Process

Emission Source/Control: SH204 - Process

Emission Source/Control: SH205 - Process

Emission Source/Control: SH206 - Process

Item 39.2(From Mod 0):

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



Emission Unit: 0-00001

Process: 001 Source Classification Code: 1-03-006-03

Process Description:

The use of natural gas and diesel as fuel for combustion sources (boilers, furnaces, generators) throughout the

facility.

Emission Source/Control: 00001 - Combustion

Item 39.3(From Mod 0):

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

Emission Unit: 0-00002

Process: 002 Source Classification Code: 3-09-001-99

Process Description:

The use of equipment throughout the facility that

generate particulate emissions.

Emission Source/Control: 00002 - Process

Emission Source/Control: CS001 - Process

Emission Source/Control: EBW01 - Process

Emission Source/Control: LE001 - Process

Emission Source/Control: LE201 - Process

Emission Source/Control: LW171 - Process

Emission Source/Control: LW201 - Process

Emission Source/Control: LW202 - Process

Item 39.4(From Mod 0):

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

Emission Unit: 0-00004

Process: 004 Source Classification Code: 3-09-043-00

Process Description:

The use of facility-wide soldering equipment with many hand held soldering stations, wave soldering, and

selective solder machines.

Emission Source/Control: 00004 - Process

Emission Source/Control: 00041 - Process

Emission Source/Control: 00042 - Process

Emission Source/Control: 00043 - Process



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Permit ID: 9-1442-00040/02003

Item 39.5(From Mod 0):

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

Emission Unit: 0-00005

Process: 005 Source Classification Code: 3-09-011-99

Process Description:

The use of a non-electrolytic metal coating operation consisting of a chromate conversion coating plating line.

Emission Source/Control: CHRO1 - Process

Emission Source/Control: CHRO2 - Process

Item 39.6(From Mod 0):

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

Emission Unit: 0-00006

Process: 006 Source Classification Code: 4-02-001-01

Process Description:

The use of three paint spray booths equipped with filters and HVLP guns, and one dip tank which uses methylene

chloride.

Emission Source/Control: DIP01 - Process

Design Capacity: 40 gallons

Emission Source/Control: SB001 - Process

Emission Source/Control: SB002 - Process

Emission Source/Control: SB003 - Process

Item 39.7(From Mod 0):

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

Emission Unit: 0-00007

Process: 007 Source Classification Code: 3-09-825-99

Process Description: Operation of the wastewater evaporator.

Emission Source/Control: 00031 - Process

Item 39.8(From Mod 0):

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

Emission Unit: 0-00008

Process: 008 Source Classification Code: 3-09-011-02

Process Description:

Operation of the chemical cleaning process tanks using

hazardous air pollutants (HAPs).

Emission Source/Control: CC001 - Process



New York State Department of Environmental Conservation

Permit ID: 9-1442-00040/02003 Facility DEC ID: 9144200040

Emission Source/Control: CC002 - Process

Emission Source/Control: CC003 - Process

Condition 40: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 60, NSPS Subpart IIII

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility, specifically diesel-powered emergency generators with construction commencement after July 11, 2005 and manufactured after April 1, 2006, is subject to 40CFR60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. These generators are certified as compliant with the Subpart IIII standard as detailed in correspondence from Mr. Christopher Russin of Moog dated September 6, 2012.

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 1/30/2016.

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

Condition 41: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 60, NSPS Subpart JJJJ

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility, specifically emergency generators with

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New York State Department of Environmental Conservation

Permit ID: 9-1442-00040/02003 Facility DEC ID: 9144200040

construction commencement after June 12, 2006 and engine manufacture after January 1, 2009, is subject to 40CFR60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

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 1/30/2016.

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

Condition 42: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63, Subpart ZZZZ

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility, specifically emergency generators, is subject to 40CFR63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.

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 1/30/2016.

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

Condition 1-3: Compliance Certification

Effective between the dates of 01/29/2018 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR Part 226

Replaces Condition(s) 43

Item 1-3.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003

Item 1-3.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

6NYCRR 226. Requirements for Cold Cleaning Degreasers

This condition does not apply to customized isopropyl alcohol (IPA) solvent spray hoods that Moog uses to clean high precision motion control parts under a process-specific Volatile Organic Compounds (VOC) Reasonable Available Control Technology (RACT) determination described in a separate permit condition under the applicable requirement of 6NYCRR Part 226.5.

A. Equipment Specifications

The following types of control equipment must be used when conducting cold cleaning degreasing:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical.
- (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. This does not apply to remote reservoir degreasers.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C, unless the degreaser is:
- (a) used in special and extreme solvent metal cleaning; or
- (b) has received department approval of a demonstration that compliance with the requirement of a solvent with a vapor pressure of 1.0 mm Hg, or less, at 20°C will result in unsafe operating conditions; or
- (c) is located in a permanent total enclosure having control equipment that is designed and operated with an overall VOC removal efficiency of 90 percent or greater.

B. Operating Requirements:

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

C. General Requirements:

A person conducting solvent metal cleaning must: (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate



into the atmosphere.

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

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 7/30/2018.

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

Condition 44: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 6 NYCRR 226.5

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003



Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Where it can be demonstrated that a solvent metal cleaning process cannot be controlled to comply with sections 226.2, 226.3 and 226.4 of this Part for reasons of technological and economic infeasibility, the Department may accept a lesser degree of control upon submission of satisfactory evidence that the person engaging in solvent metal cleaning is applying reasonably available control technology (RACT) and has a plan to develop the technologies necessary to comply with the aforementioned sections.

Process specific RACT demonstrations shall be submitted with the application for a Title V facility permit or a State facility permit for an existing source under the provisions of Part 201 of this Title. Such process specific RACT demonstrations must be submitted to the United States Environmental Protection Agency for approval as a revision to the State Implementation Plan.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 45: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63.11507(e), Subpart

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Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00005

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of an affected new or existing dry mechanical polishing equipment that emits one or more of the plating and polishing metal HAP, must operate a capture system that captures particulate matter (PM) emissions from the dry mechanical polishing process and transports the emissions to a cartridge, fabric, or high efficiency particulate air (HEPA) filter, according to paragraphs (1) and (2).



(1) The owner or operator must operate all capture and control devices according to the manufacturer's specifications and operating instructions.

(2) The owner or operator must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 46: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63.11507(e), Subpart

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Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00005

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility is subject to 40CFR63 Subpart WWWWWW, Area Source Standards for Plating and Polishing Operations. The applicable requirements for this specific facility are detailed in the Notification of Compliance Status submitted by Ms. Meri Scappatura of Moog via letter dated March 29, 2011.

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 1/30/2016.

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

Condition 47: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement:40CFR 63.11507(g), Subpart

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Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00005

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of an affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP must implement the applicable management practices in paragraphs (1) through (12), as practicable.

- (1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- (2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- (3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- (4) Use tank covers, if already owned and available at the facility, whenever practicable.
- (5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- (6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- (7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- (8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.



- (9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- (10) Minimize spills and overflow of tanks, as practicable.
- (11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- (12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

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 1/30/2016.

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

Condition 48: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63.11507(g), Subpart

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Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00005

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility is subject to 40CFR63 Subpart WWWWWW, Area Source Standards for Plating and Polishing Operations. The applicable requirements for this specific facility are detailed in the Notification of Compliance Status submitted by Ms. Meri Scappatura of Moog via letter dated March 29, 2011.

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 1/30/2016.

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

Condition 49: Compliance Certification

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New York State Department of Environmental Conservation

Permit ID: 9-1442-00040/02003 Facility DEC ID: 9144200040

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63, Subpart HHHHHHH

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00006

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is subject to 40CFR63 Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The applicable requirements for this specific facility are detailed in the Notification of Compliance Status submitted by Ms. Meri Scappatura of Moog via letter dated February 10, 2011.

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 1/30/2016.

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

Condition 50: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63.11173(a), Subpart

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Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00006

Regulated Contaminant(s):

CAS No: 000075-09-2 **DICHLOROMETHANE**

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

> For each paint stripping operation that meets the qualifications for an affected source under 40 CFR 63, subpart HHHHHH, the facility must implement management practices to minimize the evaporative emissions of methylene chloride. The management practices must

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address, at a minimum, the practices listed below:

- 1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).
- 2) Evaluate each application where a paint stripper containing methylene chloride is used to ensure that there is no alternative paint stripping technology that can be used.
- 3) Reduce exposure of all paint strippers containing methylene chloride to the atmosphere.
- 4) Optimize application conditions when using paint strippers containing methylene chloride to reduce methylene chloride evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low a possible to reduce evaporation).
- 5) Practice proper storage and disposal of paint strippers containing methylene chloride (e.g., store stripper in closed, air-tight containers).

Reporting Requirements: SEMI-ANNUALLY (CALENDAR) Reports due 30 days after the reporting period. The initial report is due 1/30/2016. Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement: 40CFR 63.11173(c), Subpart

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Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00006

Regulated Contaminant(s):

CAS No: 000075-09-2 DICHLOROMETHANE

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

For each paint stripping operation, the facility must maintain copies of annual usage of paint strippers containing methylene chloride on site at all times.

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period. The initial report is due 1/30/2016.

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

Condition 52: Compliance Certification

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable Federal Requirement:6 NYCRR 212.9 (b)

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00007

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The wastewater evaporator is subject to the requirements of Part 212. Based on stack test results, a particulate rating of "A", and Table 2 from Part 212.9(b), it was determined that no additional air cleaning is required for this emission source. Compliance will be assured by maintaining the wastewater evaporator and related equipment as required by the manufacturer.

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 1/30/2016.

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



STATE ONLY ENFORCEABLE CONDITIONS

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: 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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 53: Contaminant List

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law.

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable State Requirement: ECL 19-0301

Item 53.1:

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

CAS No: 000075-09-2

Name: DICHLOROMETHANE

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

Condition 54: Malfunctions and start-up/shutdown activities

Effective between the dates of 08/28/2015 and 08/27/2020

Applicable State Requirement: 6 NYCRR 201-1.4

Item 54.1:

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to

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

- (c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.
- (d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.