

Facility DEC ID: 9144800016

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1448-00016/00025
Effective Date: 04/01/2026 Expiration Date: 03/31/2036

Permit Issued To: FORD MOTOR COMPANY
ONE AMERICAN RD
DEARBORN, MI 48121

Contact: Jamie Hayward
Ford Motor Company
1 AMERICAN ROAD
DEARBORN, MI 48126
(318) 805-9166

Facility: FORD MOTOR BUFFALO STAMPING PLANT
3663 S LAKE SHORE RD
Hamburg, NY 14219

Contact: MICHELLE MENDIETA
3663 S LAKESHORE ROAD
BUFFALO, NY 14219
(716) 821-4313

Description:

The Ford Motor Company Buffalo Stamping Plant manufactures automobile and light duty truck sheet metal component stampings, including body parts subassembly involving resistance welding and laser welding, and application of body sealers.

This second permit renewal includes the removal of the 95 tons per year (190,000 pounds per year) NOx and SO2 emission caps, and the addition of 40 CFR 63 JJJJJ applicability. As of 2026, The Buffalo Stamping Plant has not used #6 fuel oil for their dual fired boilers in over 10 years. The facility does not intend to use the fuel oil in the future and no longer has the infrastructure to do so. The fuel oil tank was permanently closed in 2012, and in 2013 the tank was demolished, and the underground piping was abandoned in place. Without #6 fuel oil combustion, facility-wide NOx and SO2 emissions calculations demonstrate low enough amounts to warrant removal of the caps.

This renewal also includes the addition of a high energy laser welder that uses silicon bronze welding wire to join metal parts together. The welding wire contains small amounts of manganese, a High Toxicity Air Contaminant

Facility DEC ID: 9144800016

(HTAC). Potential manganese emissions are expected to be approximately 4.52 lb/yr and actual emissions are expected to be approximately 0.06195 lb/yr, both figures being below the 10 lb/yr Mass Emission Limit (MEL) for manganese per Table 2 of 6 NYCRR Part 212-2.2. As such, the facility is compliant with Part 212-2.1(a) and not required to demonstrate compliance with the applicable annual and short-term guidance concentrations (AGC/SQC), and no further Part 212 analysis is required.

The previous modification allowed for the installation and operation of a scrap aluminum conveyance system for off-site recycling which is identical to one installed in 2009 under the first modification to this permit. The total system now consists of six (6) press lines, six (6) shredders, metal duct work, two (2) cyclone filters which separate the aluminum from the air stream, and one high energy laser welder. The cyclone system and laser welder are subject to the particulate emission limitations found in Part 212-1.6(a) and 212-2.4(b).

The facility has six (6) emission units including three (3) 51.8 MMBtu/hr boilers capable of burning #6 fuel oil and natural gas, the scrap aluminum conveyance system, the laser welder, and QA/QC hi-lighting activities. There are also many natural gas space heaters that are exempt per 6 NYCRR Part 201-3.2(c)(1) and a spray booth that is exempt per 6 NYCRR Part 201-3.2(c)(17). The facility's other exempt activities include the application of body adhesives/sealants/epoxies/mastics that are exempt per 228-2.2(a)(3).

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: KRISTINE M CARLSON
NYSDEC - REGION 9
700 DELAWARE AVE
BUFFALO, NY 14209

Authorized Signature: _____ Date: ___ / ___ / ____

Facility DEC ID: 9144800016

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.

Facility DEC ID: 9144800016

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 5 1 Facility Inspection by the Department
- 5 2 Relationship of this Permit to Other Department Orders and Determinations
- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 6 5 Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Facility DEC ID: 9144800016

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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

Item 3.3

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

Facility DEC ID: 9144800016

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

Item 4.1:

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

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

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

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

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
700 Delaware Ave.,
Buffalo, NY 14209
(716) 851-7130

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: FORD MOTOR COMPANY
ONE AMERICAN RD
DEARBORN, MI 48121

Facility: FORD MOTOR BUFFALO STAMPING PLANT
3663 S LAKE SHORE RD
Hamburg, NY 14219

Authorized Activity By Standard Industrial Classification Code:
3465 - AUTOMOTIVE STAMPINGS

Permit Effective Date: 04/01/2026

Permit Expiration Date: 03/31/2036

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 6 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 6 2 6 NYCRR 200.7: Maintenance of Equipment
- 6 3 6 NYCRR 201-1.7: Recycling and Salvage
- 7 4 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 7 5 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 7 6 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 7 7 6 NYCRR 202-1.1: Required Emissions Tests
- 7 8 6 NYCRR 211.2: Visible Emissions Limited
- 8 9 6 NYCRR 212-1.5 (g): Maintain all process emission sources, including the associated air pollution control and monitoring equipment
- 8 10 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 9 11 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 10 12 6 NYCRR 227-1.3 (c): Compliance Demonstration
- 11 13 6 NYCRR 227-1.4 (a): Compliance Demonstration
- 12 14 40CFR 60, NSPS Subpart A: Applicability of Subpart A General Provisions
- 12 15 40CFR 60, NSPS Subpart IIII: Applicability
- 12 16 40CFR 63, Subpart JJJJJ: Compliance Demonstration
- 14 17 40CFR 63, Subpart ZZZZ: Applicability

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 16 18 ECL 19-0301: Contaminant List
- 16 19 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 17 20 6 NYCRR Subpart 201-5: Emission Unit Definition
- 19 21 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 19 22 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 19 23 6 NYCRR 211.1: Air pollution prohibited
- 20 24 6 NYCRR 212-2.2: Compliance Demonstration

Emission Unit Level

- 21 25 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 22 26 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

FEDERALLY ENFORCEABLE CONDITIONS

Renewal 2/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

required to operate such device effectively.

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

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 04/01/2026 and 03/31/2036

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

Condition 2: Maintenance of Equipment
Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:6 NYCRR 200.7

Item 2.1:

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 3: Recycling and Salvage
Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 3.1:

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 4: Prohibition of Reintroduction of Collected Contaminants to the air

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 4.1:

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 5: Exempt Sources - Proof of Eligibility

Effective between the dates of 04/01/2026 and 03/31/2036

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

Item 5.1:

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.

Condition 6: Trivial Sources - Proof of Eligibility

Effective between the dates of 04/01/2026 and 03/31/2036

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

Item 6.1:

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 7: Required Emissions Tests

Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 7.1:

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 8: Visible Emissions Limited

Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:6 NYCRR 211.2

Item 8.1:

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 9: Maintain all process emission sources, including the associated air pollution control and monitoring equipment Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:6 NYCRR 212-1.5 (g)

Item 9.1:

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safety, good air pollution control practices, good engineering practices and manufacturers’ recommendations for minimizing emissions.

Condition 10: Compliance Demonstration Effective between the dates of 04/01/2026 and 03/31/2036

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

Item 10.1:

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

Emission Unit: U-ALCYC

Emission Unit: U-LSWLD

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 10.2:

Compliance Demonstration 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 process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of an EPA Reference Test Method 9 opacity evaluation at any time during facility operation.

The facility owner or operator shall conduct a visible emissions observation of all emission points specified by this condition once per month while the process is in

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

operation. The facility owner or operator will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard specified below.

The facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the specified limit (except the emission of uncombined water) are observed for three consecutive operating days from the same emission point, the facility owner or operator will notify the Department of the observations within one business day. The facility owner or operator will also perform an EPA Reference Test Method 9 opacity evaluation analysis of the affected emission point and submit the results to the Department.

Monthly records of the visible emissions observations, any follow-up Method 9 observations, investigations, and corrective actions taken are to be maintained on site for a period of at least five years from the date of the record. Such records shall include the date and time of each observation, weather conditions, results of the observation, corrective actions taken, and explanations for days when weather conditions were prohibitive.

All records kept pursuant to this condition must be provided to the Department upon request.

Parameter Monitored: OPACITY
 Upper Permit Limit: 20 percent
 Reference Test Method: EPA Method 9
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration
Effective between the dates of 04/01/2026 and 03/31/2036

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

Item 11.1:
 The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: U-ALCYC

Emission Unit: U-LSWLD

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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

- (1) As required by 6NYCRR Part 212-2.4(b)(1), emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).
- (2) Compliance with this requirement shall be completed by operating and maintaining the laser welding equipment and each cyclone system in accordance with manufacturer recommendations.
- (3) As per 212-1.7(a) 'Sampling and monitoring' section, facility owners and/or operators of a process emission source required by the department to demonstrate compliance with this Part may be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to Part 202 of this Title.
- (4) Maintenance records shall be kept on-site and be made available to the Department upon request.
- (5) Upon request, a written report of any malfunction of the control equipment shall be submitted to the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Reference Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance Demonstration
Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement: 6 NYCRR 227-1.3 (c)

Item 12.1:

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

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

Emission Unit: U-00015

Emission Unit: U-00016

Emission Unit: U-00017

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a stationary combustion installation must perform an annual tune-up on each emission source subject to 6 NYCRR Subpart 227-1. Records of the tune-up shall be maintained at the facility or at a Department approved alternative location for a minimum of five years. The records shall, at a minimum, include the date the tune-up(s) occurred and the details of the tune-up procedures for each emission source.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Compliance Demonstration

Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:6 NYCRR 227-1.4 (a)

Item 13.1:

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

Emission Unit: U-00015

Emission Unit: U-00016

Emission Unit: U-00017

Item 13.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No owner or operator shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (based on a six minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The owner or operator will conduct a

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Method 9 test upon the request of the Department. A report of the results of the test will be submitted to the Department within 30 days of the completion of the Method 9 test. All records generated by the permittee must be maintained at the facility or at an alternative location approved by the Department for a minimum of five years.

Parameter Monitored: OPACITY
 Upper Permit Limit: 20 percent
 Reference Test Method: 40 CFR 60, Appendix A, Method 9
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Applicability of Subpart A General Provisions
Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:40CFR 60, NSPS Subpart A

Item 14.1:
 This emission source is subject to the applicable general provisions of 40 CFR 60. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 15: Applicability
Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:40CFR 60, NSPS Subpart IIII

Item 15.1:
 Facilities that have stationary compression ignition internal combustion engines must comply with applicable portions of 40 CFR 60 Subpart IIII.

Condition 16: Compliance Demonstration
Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:40CFR 63, Subpart JJJJJ

Item 16.1:
 The Compliance Demonstration activity will be performed for the Facility.

Item 16.2:
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:
 The facility operates three (3) dual fuel (natural gas and oil) fired boilers that may be subject to 40CFR63 Subpart JJJJJ (National Emission Standard for Hazardous

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources).

The boilers will NOT be subject to the rule if they continuously meet the definition of "gas-fired boiler" per §63.11237 which reads "A gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year."

§63.11237 defines 'period of natural gas curtailment or supply interruption' to mean "a period of time during which the supply of natural gas to an affected facility is halted for reasons beyond the control of the facility. The act of entering into a contractual agreement with a supplier of natural gas established for curtailment purposes does not constitute a reason that is under the control of a facility for the purposes of this definition. An increase in the cost or unit price of natural gas does not constitute a period of natural gas curtailment or supply interruption."

If a liquid fuel is used for more than a combined total of 48 hours during any calendar year, outside of a gas curtailment or gas supply emergency, the boiler(s) will become subject to subpart JJJJJ and will need to comply with all applicable technical, administrative, and reporting requirements specified in this regulation and in this Air State Facility permit.

When a boiler becomes subject to this rule, the facility must:

- Submit notification of such a change within 30 days of the change [§63.11225(g)].
- Demonstrate compliance with the rule within 180 days of the change [63.00210(h)].

The compliance requirements of this rule are not included in this permit because the facility anticipates burning natural gas for the foreseeable future.

All required records shall be maintained onsite for a minimum of 5 years and shall be available for NYSDEC and/or USEPA review upon request.

Work Practice Type: HOURS PER YEAR OPERATION

Upper Permit Limit: 48 hours

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Reference Test Method: something

Monitoring Frequency: WHEN THE SOURCE IS OPERATING

Averaging Method: ANNUAL TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Applicability

Effective between the dates of 04/01/2026 and 03/31/2036

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 17.1:

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

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

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 in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction provision contained in any applicable requirement.

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

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

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

with 6 NYCRR Part 616 - Public Access to Records.
Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 18: Contaminant List

Effective between the dates of 04/01/2026 and 03/31/2036

Applicable State Requirement:ECL 19-0301

Item 18.1:

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

CAS No: 007439-96-5

Name: MANGANESE

CAS No: 0NY075-00-0

Name: PARTICULATES

Condition 19: Malfunctions and Start-up/Shutdown Activities

Effective between the dates of 04/01/2026 and 03/31/2036

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Applicable State Requirement:6 NYCRR 201-1.4**Item 19.1:**

(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 maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, 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 monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall 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. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. 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, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 20: Emission Unit Definition**Effective between the dates of 04/01/2026 and 03/31/2036****Applicable State Requirement:6 NYCRR Subpart 201-5****Item 20.1:**

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

Emission Unit: U-00015

Emission Unit Description:

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

51.8 MMBtu package boiler. The boiler burns natural gas and No. 6 fuel oil as fuels. It is located in the facility powerhouse and exhausts to one stack located on the powerhouse. No air emission control devices are present.

Building(s): PH

Item 20.2:

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

Emission Unit: U-00016

Emission Unit Description:

51.8 MMBtu package boiler. The boiler burns natural gas and No. 6 fuel oil as fuels. It is located in the facility powerhouse and exhausts to one stack located on the powerhouse. No air emission control devices are present.

Building(s): PH

Item 20.3:

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

Emission Unit: U-00017

Emission Unit Description:

51.8 MMBtu package boiler. The boiler burns natural gas and No. 6 fuel oil as fuels. It is located in the facility powerhouse and exhausts to one stack located on the powerhouse. No air emission control devices are present.

Building(s): PH

Item 20.4:

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

Emission Unit: U-ALCYC

Emission Unit Description:

Scrap aluminum conveyance system for off-site recycling. System consists of six (6) press lines, six (6) shredders, metal duct work, and two cyclone filters which separate the aluminum from the air stream.

Building(s): CB

Item 20.5:

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

Emission Unit: U-FAC04

Emission Unit Description:

Air emissions associated with quality assurance/quality control activities involving use of a hi-lighting product. All emissions are released to the general plant atmosphere and are not associated with any emission point.

Building(s): MA

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Item 20.6:

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

Emission Unit: U-LSWLD

Emission Unit Description:

Air emissions associated with high energy laser welding process. The welder uses a high energy laser and silicon bronze welding wire to join metal parts together. The enclosed booth is vented via exhaust stack through the building roof.

Building(s): MA

Condition 21: Renewal deadlines for state facility permits
Effective between the dates of 04/01/2026 and 03/31/2036

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

Item 21.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 22: Compliance Demonstration
Effective between the dates of 04/01/2026 and 03/31/2036

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

Item 22.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
700 Delaware Ave.,
Buffalo, N.Y. 14209

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 23: Air pollution prohibited
Effective between the dates of 04/01/2026 and 03/31/2036

Applicable State Requirement:6 NYCRR 211.1

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Item 23.1:

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 24: Compliance Demonstration**Effective between the dates of 04/01/2026 and 03/31/2036****Applicable State Requirement: 6 NYCRR 212-2.2****Item 24.1:**

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

Emission Unit: U-LSWLD

Regulated Contaminant(s):
CAS No: 007439-96-5 MANGANESE

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – high toxicity air contaminant (HTAC) list, the facility owner or operator shall limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit (MEL) listed for an individual HTAC. If the limit is exceeded the facility owner or operator must demonstrate compliance with the air cleaning requirements for the HTAC(s) as specified in subdivision 212-2.3(b), Table 4 – degree of air cleaning required for non-criteria air contaminants.

The facility emits manganese, which is listed in Table 2 as an HTAC with an MEL of 10 pounds per year (lb/yr), from one emission source (U-LSWLD). The high energy laser welder uses an alloy welding wire that contains manganese. Based on the maximum manganese content of the wire and the actual wire usage quantity, the actual emissions of manganese from the proposed process are less than the MEL.

The facility shall record the quantity of welding wire used at the facility each calendar month. The wire usage

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

records shall be used to calculate actual monthly manganese emissions and actual annual emissions to demonstrate compliance with the MEL. These records shall be maintained on site for 5 years from the last entry and be made available to NYSDEC upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**** Emission Unit Level ****

Condition 25: Emission Point Definition By Emission Unit
Effective between the dates of 04/01/2026 and 03/31/2036

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1:

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

Emission Unit: U-00015

Emission Point: 00015

Height (ft.): 66 Diameter (in.): 72
NYTMN (km.): 4744.32 NYTME (km.): 185.629 Building: PH

Item 25.2:

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

Emission Unit: U-00016

Emission Point: 00016

Height (ft.): 66 Diameter (in.): 72
NYTMN (km.): 4744.32 NYTME (km.): 185.629 Building: PH

Item 25.3:

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

Emission Unit: U-00017

Emission Point: 00017

Height (ft.): 66 Diameter (in.): 72
NYTMN (km.): 4744.32 NYTME (km.): 185.629 Building: PH

Item 25.4:

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

Emission Unit: U-ALCYC

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Emission Point: 00018
 Height (ft.): 83 Diameter (in.): 120
 NYTMN (km.): 4744.32 NYTME (km.): 185.629 Building: CB

Emission Point: 00019
 Height (ft.): 83 Diameter (in.): 120
 NYTMN (km.): 4744.3 NYTME (km.): 185.6 Building: CB

Item 25.5:

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

Emission Unit: U-LSWLD

Emission Point: 00020
 Height (ft.): 32 Diameter (in.): 36
 NYTMN (km.): 4744.32 NYTME (km.): 185.629 Building: MA

Condition 26: Process Definition By Emission Unit
Effective between the dates of 04/01/2026 and 03/31/2036

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 26.1:

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

Emission Unit: U-00015
 Process: 002 Source Classification Code: 1-02-006-02
 Process Description:
 Combustion of natural gas in a 51.8 MMBtu package boiler.

Emission Source/Control: B0001 - Combustion
 Design Capacity: 51,800,000 British thermal units per hour

Item 26.2:

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

Emission Unit: U-00016
 Process: 004 Source Classification Code: 1-02-006-02
 Process Description:
 Combustion of natural gas in a 51.8 MMBtu package boiler.

Emission Source/Control: B0002 - Combustion
 Design Capacity: 51,800,000 British thermal units per hour

Item 26.3:

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

Emission Unit: U-00017
 Process: 006 Source Classification Code: 1-02-006-02
 Process Description:
 Combustion of natural gas in a 51.8 MMBtu package boiler.

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016

Emission Source/Control: B0003 - Combustion
Design Capacity: 51,800,000 British thermal units per hour

Item 26.4:

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

Emission Unit: U-ALCYC
Process: 020 Source Classification Code: 3-09-030-10
Process Description:

Scrap aluminum is generated as a result of stamping aluminum automotive parts. The scrap aluminum falls into a shredder. The shredded aluminum is conveyed via air flow through ducts to the cyclone. The cyclone separates the aluminum from the air stream and then drops the aluminum into trucks which transfer the aluminum to an off-site recycler.

Emission Source/Control: AL001 - Process

Item 26.5:

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

Emission Unit: U-FAC04
Process: 013 Source Classification Code: 3-99-999-94
Process Description:

Air emissions associated with quality assurance/quality control activities involving use of a Hi-Lighting product. All emissions are released to the general plant atmosphere and are not associated with any emission point.

Emission Source/Control: QA001 - Process

Item 26.6:

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

Emission Unit: U-LSWLD
Process: 007 Source Classification Code: 3-12-999-99
Process Description:

Air emissions associated with high energy laser welding process. The welder uses a high energy laser and silicon bronze welding wire to join metal parts together. The enclosed booth is vented via exhaust stack through the building roof.

Emission Source/Control: LW001 - Process

Permit ID: 9-1448-00016/00025

Facility DEC ID: 9144800016