

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type:	Air State Facility
Permit ID:	9-2909-00018/00502
	Effective Date: 09/18/2020 Expiration Date: 09/17/2025

Permit Issued To:GM COMPONENTS HOLDINGS LLC 300 RENAISSANCE CTR DETROIT, MI 48265-3000

- Contact: Kenneth A Johnson General Motors LLC 200 Upper Mountain Rd Lockport, NY 14094-1896 (716) 439-3393
- Facility: GM COMPONENTS HOLDINGS LLC LOCKPORT 200 UPPER MOUNTAIN RD LOCKPORT, NY 14094
- Contact: GREGORY KULKA GM COMPONENTS HOLDINGS LLC 200 UPPER MOUNTAIN RD LOCKPORT, NY 14094-1896 (716) 439-2689

Description:

This Air State Facility (ASF) permit allows the construction and operation of a new emission unit, C-AB07E, which consists of two controlled atmosphere brazing lines (CAB) to produce heat exchangers. The emission sources for each CAB line include a thermal degreaser with a thermal oxidizer, a brazing furnace with a wet scrubber, and a cooling zone. The remainder of the facility operates under the auspices of a separate ASF permit which was issued on February 14, 2014.

The potential-to-emit (PTE) volatile organic compounds (VOC) from the new emission unit, when combined with the VOC PTE from the rest of the facility, exceeded the major source applicability threshold of 50 tons per year. While the expected actual VOC emissions from the entire facility were less than the applicability threshold, the permittee opted to forgo the inclusion of an emission limitation and instead accepted major source status and Title V applicability. Under the provisions of 6NYCRR Part 201-6.2(a)(2), the permittee chose to apply for a State facility permit per §201-5.2 to authorize construction and operation of the new emission unit and must apply for a Title V permit which will incorporate the requirements of the two ASF permits within one year of commencement of operation of emission unit C-AB07E.



Contaminants emitted from this emission unit include particulate (PM), hexavalent chromium (Cr+6), hydrogen fluoride (HF), total fluorides (F), and volatile organic compounds (VOC).

§212-3.1(c) - VOC Reasonably Available Control Technology (RACT) applies to the two new thermal degreasers since each has a VOC emission rate potential that exceeds 3 pounds per hour and the facility is subject to the "once in, always in" provision per §212-3.1(e). As such, the sources are required to be equipped with control equipment having an overall VOC removal efficiency of 81%. Each degreaser is equipped with a thermal oxidizer for VOC control. A representative source performance test must be conducted on one of the two oxidizers within 180 days of startup to document the overall VOC removal efficiency at a specific temperature.

Compliance with 6NYCRR Part 212 was evaluated in accordance with the procedures in the Department's guidance document "DAR-1: Guidelines for the Evaluation and Control of Ambient Air Contaminants under Part 212" for facility-wide emissions of Cr+6, HF and F. The facility emits Cr+6, which is classified as a High Toxicity Air Contaminant (HTAC) in §212-2.2 Table 2, at an actual annual emission rate greater than the Mass Emission Limit of 0.1 pounds per year. Neither HF nor F is classified as HTACs, but, as non-HTACs emitted from process sources with emission rate potentials greater than 100 pounds per year, they were required to demonstrate Part 212 compliance. The maximum offsite concentrations of HF and F were determined using the AERMOD air dispersion model and compared to the respective short-term (SGC) and annual guideline concentrations (AGC), using the guidelines contained within DAR-1, and were determined to comply with Part 212 control requirements. The maximum offsite air concentration of Cr+6 determined using AERMOD exceeded the AGC, necessitating the completion of a Best Available Control Technology for Toxics (T-BACT) Analysis per the guidelines of DAR-1 and a determination of whether the modeled impact was within the acceptable risk management range. The T-BACT Analysis demonstrated that the process emission sources are being controlled similar to the best controlled emission source in the applicable source category. Per DAR-1, the acceptable risk management range for predicted maximum offsite concentration of non-criteria air contaminants identified as carcinogens must be less than 10-in-a-million excess cancer risk; thus, the maximum predicted concentration of Cr+6 for the facility must be less than 10 times the AGC, which is 20.0E-5 ug/m3. The maximum offsite concentration of Cr+6 for the facility as predicted by the model is 19.16E-5 ug/m3 which is within the acceptable risk management range.



The degree of control of HF and F emissions by wet scrubbers described within the permit application and used as in an input to the AERMOD model will be assured by the appropriate monitoring and recording of critical operating parameters as defined in an operating plan to be submitted to the Department prior to the start of operations.

Per the New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, effective January 1, 2020, the permittee was required to submit an acceptable discussion of the climate impacts of the project and how they will be mitigated within the permit application. CLCPA directs state agencies to ensure that new permits issued are consistent with aggressive Greenhouse Gas (GHG) reduction goals. The new emission unit will use natural gas in the thermal degreaser (process) and thermal oxidizer (abatement system) of the two new brazing lines. Natural gas is widely recognized as a clean-burning fuel. The gas used in the thermal oxidizer will be for controlling VOCs, as required by Department regulations. Impacts of emissions generated by the burning of natural gas in the thermal oxidizers are balanced against the control of other pollutants of higher concern. The two new braze lines will potentially increase GHG emissions by 4222 tons per year, on top of the actual 11,779 tons of GHG emitted by the current operations. In addition, there are no technically and economically feasible alternatives to natural gas in both the process and abatement applications for this project. Specifically, an electric thermal degreaser was considered but determined to be a novel and unproven technology that would carry a strong risk of short-circuiting the heating elements that are exposed to the flux in the oven atmosphere. Therefore, electric thermal degreasing was determined to not be technically feasible.

HF, F, and Cr+6 are the co-pollutants, otherwise defined as hazardous air pollutants in CLCPA, that are emitted from the new brazing lines. There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) that apply to the new brazing lines. In addition, the Part 212 Toxics Impact Screening Analysis shows no unacceptable offsite impacts (per NYSDEC DAR-1) for HF and F from the brazing operations controlled by wet scrubbers. The Part 212 Toxics Impact Screening Analysis shows no unacceptable offsite impacts (per NYSDEC DAR-1) for Cr+6, considering that the thermal degreasers are controlled to a level that is equivalent to Toxic – Best Available Control Technology (T-BACT).

The facility will be subject to regulations subsequently promulgated in support of CLCPA to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.



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.



PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS General Provisions

- 4 1 Facility Inspection by the Department
- 4 2 Relationship of this Permit to Other Department Orders and Determinations
- 4 3 Applications for permit renewals, modifications and transfers
- 5 4 Permit modifications, suspensions or revocations by the Department Facility Level
- 5 5 Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, 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.

Item3.2:

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.

DEC Permit Conditions



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 270 Michigan Avenue Buffalo, NY 14203-2915 (716) 851-7165



Facility DEC ID: 9290900018

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:GM COMPONENTS HOLDINGS LLC 300 RENAISSANCE CTR DETROIT, MI 48265-3000

Facility: GM COMPONENTS HOLDINGS LLC - LOCKPORT 200 UPPER MOUNTAIN RD LOCKPORT, NY 14094

Authorized Activity By Standard Industrial Classification Code: 3585 - REFRIGERATION & HEATING EQUIPMENT 3714 - MOTOR VEHICLE PARTS & ACCESSORIES

Permit Effective Date: 09/18/2020

Permit Expiration Date: 09/17/2025



Facility DEC ID: 9290900018

PAGE LOCATION OF CONDITIONS

PAGE

PAGE		
	FEDERALLY ENFORCEABLE CONDITIONS	
	Facility Level	
6	1 6 NYCRR 211.2: Visible Emissions Limited	
6	2 6 NYCRR 212-1.6 (a): Compliance Demonstration	
7	3 6 NYCRR 212-2.4 (b): Compliance Demonstration	
8	4 6 NYCRR 212-3.1 (c) (1): Compliance Demonstration	
9	5 6 NYCRR 212-3.1 (c) (4) (i): Compliance Demonstration	
10	6 6 NYCRR 212-3.1 (c) (4) (i): Compliance Demonstration	
11	7 6 NYCRR 212-3.1 (e): "Once in always in" provision	
	STATE ONLY ENFORCEABLE CONDITIONS	
	Facility Level	
14	8 ECL 19-0301: Contaminant List	
15	9 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities	
15	10 6 NYCRR Subpart 201-5: Emission Unit Definition	
16	11 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits	
16	12 6 NYCRR 201-5.3 (c): CLCPA Applicability	
16	13 6 NYCRR 201-5.3 (c): Compliance Demonstration	
17	14 6 NYCRR 201-5.3 (c): Compliance Demonstration	
17	15 6 NYCRR 211.1: Air pollution prohibited	
18	16 6 NYCRR 212-2.2: Compliance Demonstration	
20	17 6 NYCRR 212-2.3 (b): Compliance Demonstration	
20	18 6 NYCRR 212-2.3 (b): Compliance Demonstration	
	Emission Unit Level	
23	19 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit	
24	20 6 NYCRR Subpart 201-5: Process Definition By Emission Unit	



FINAL

Facility DEC ID: 9290900018

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

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

> Air Pollution Control Permit Conditions Page 3 FINAL



Facility DEC ID: 9290900018

required to operate such device effectively.

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

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

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

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

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

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

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8 No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a) The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial

Facility DEC ID: 9290900018

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)

Air Pollution Control Permit Conditions Page 5 FINAL



Facility DEC ID: 9290900018

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: Visible Emissions Limited Effective between the dates of 09/18/2020 and 09/17/2025

Applicable Federal Requirement:6 NYCRR 211.2

Item 1.1:

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

Condition 2: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

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

Item 2.1:

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

Emission Unit: C-AB07E

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

Item 2.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Facility owner or operator shall not cause or allow emissions having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to 6 NYCRR Part 212 into the

> Air Pollution Control Permit Conditions Page 6 FINAL

Facility DEC ID: 9290900018

outdoor atmosphere. Compliance with this requirement shall be demonstrated by maintaining process equipment and any associated emission control equipment and responding to any malfunctions immediately.

The facility owner or operator shall conduct semi-annual inspections of the production roof areas. Any observed fallout shall result in corrective action per the facility maintenance plan.

All observations will be recorded in a log book at the facility and shall be made available to the Department upon request. Records will be maintained for a minimum of 5 years.

If after corrections are made and any emissions continue to be observed, the facility owner or operator will conduct a Method 9 assessment to determine the degree of opacity. The facility owner or operator will notify the DEC immediately if the Method 9 test indicates that the opacity standard is not met.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation to determine compliance with the above opacity limit.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Reference Test Method: Method 9 Monitoring Frequency: SEMI-ANNUALLY Averaging Method: 6 MINUTE AVERAGE Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

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

Item 3.1:

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

Emission Unit: C-AB07E

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

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Air Pollution Control Permit Conditions Page 7 FINAL



Facility DEC ID: 9290900018

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

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.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.050 grains per cubic foot Reference Test Method: Method 5 Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (1)

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

VOC RACT Applicability for New Emission Sources:

The GM Component Holdings (GMCH) Lockport facility was classified as a major source for various contaminants, including volatile organic compounds (VOC), and operated under an issued Title V air permit from 2001 until 2014. The facility was subject to the Part 212 VOC Reasonably Available Control Technology (RACT) requirements. In 2014, the facility documented emissions which had decreased



Facility DEC ID: 9290900018

below the major source applicability thresholds, qualifying the facility for issuance of an Air State Facility permit. Per §212-3.1(e), any facility that is subject to the VOC RACT requirements will remain subject even if the facility's VOC emissions fall below the applicability threshold.

The two thermal degreasers (emission sources DE1XX & DE2XX) each have a VOC emission rate potential greater than 3 pounds per hour. The thermal degreasers are therefore subject to the VOC RACT requirement of §212-3.1(c)(1).

GMCH has chosen to control VOC emissions from the thermal degreasers with two thermal oxidizers (emission sources/controls DE1PC & DE2PC). The thermal oxidizers must provide 81% minimum overall removal efficiency to be considered in compliance with VOC RACT per §212-3.1(c)(4)(i). The overall removal efficiency consists of two components and is calculated as the product of the capture efficiency of the gas collection system and the destruction efficiency of the control equipment.

Initial compliance with this requirement will be demonstrated during performance testing as detailed elsewhere in this permit in a condition per §212-3.1(c)(4)(i). Continuous compliance with the minimum required 81% overall removal efficiency will be assured by: (1) maintaining and operating the capture systems as initially designed by the manufacturer, and (2) maintaining the destruction efficiency of the oxidizers.

No reporting requirements are associated with this condition.

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

Condition 5: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (4) (i)

Item 5.1:

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

Emission Unit: C-AB07E

Regulated Contaminant(s):



Facility DEC ID: 9290900018

CAS No: 0NY998-00-0 VOC

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

> GM Component Holdings (GMCH) must assure compliance with the minimum overall volatile organic compounds (VOC) removal efficiency rate of 81% for the capture and control devices associated with the thermal degreasers (emission sources DE1XX & DE2XX) and thermal oxidizers (emission source/controls DE1PC & DE2PC). The overall VOC removal efficiency, which must be verified via performance testing, is the product of the capture efficiency of the gas collection systems and the destruction efficiency of the oxidizers.

A performance test determining the destruction efficiency of one of the two identical thermal oxidizers must be performed, in accordance with 40CFR60, Appendix A, Method 18, 25 or 25A, within 180 days of start-up and once every five years, based on the date of the previous test, thereafter to assure continuous compliance with the minimum overall VOC removal efficiency rate.

Test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Parameter Monitored: VOC Lower Permit Limit: 81 percent reduction by weight Reference Test Method: EPA Method 18, 25, 25A, 204 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION Averaging Method: 1-HOUR AVERAGE Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 6: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (4) (i)

Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

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

> Air Pollution Control Permit Conditions Page 10 FINAL





Item 6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Temperature & Operating Requirements for Thermal Oxidizers (emission source/controls DE1PC & DE2PC):

GM Component Holdings (GMCH) will operate two thermal oxidizers (emission source/controls DE1PC & DE2PC) to control volatile organic compounds (VOC). GMCH will assure that all VOC-laden gas streams from operating thermal degreasers (emission sources DE1XX & DE2XX) are routed to properly operating oxidizers. GMCH will continuously monitor the combustion chamber temperatures of the oxidizers.

GMCH must maintain a minimum combustion chamber temperature of 750 degrees Celsius, based on manufacturer recommendation, upon startup. The manufacturer's recommended temperature will be used until the initial performance test is completed; afterwards the oxidizer temperatures will be maintained at or above the temperature used during the performance test. Performance testing shall be repeated at least once every five years, based on the dates of the previous tests.

A continuous monitor to measure the combustion chamber temperature must be installed, periodically calibrated, and operated whenever the oxidizers are in use. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. GMCH may opt to replace temperature sensors in lieu of calibrating. GMCH shall maintain continuous recording charts (or electronic equivalent) of the combustion chamber temperatures. The continuous chart recordings (or electronic equivalent) and the calibration data shall be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Parameter Monitored: TEMPERATURE Lower Permit Limit: 750 degrees Centigrade (or Celsius) Monitoring Frequency: CONTINUOUS Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: "Once in always in" provision Effective between the dates of 09/18/2020 and 09/17/2025



Facility DEC ID: 9290900018

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

Item 7.1:

Any facility that is subject to 6 NYCRR 212-3.1 requirements after May 31, 1995 will remain subject to these provisions even if the annual potential to emit NOx or VOCs later fall below the applicability threshold.



Facility DEC ID: 9290900018

STATE ONLY ENFORCEABLE CONDITIONS **** Facility Level ****

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

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

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

Item B: **Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)** Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.

> Air Pollution Control Permit Conditions Page 13 FINAL

Facility DEC ID: 9290900018

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 8: Contaminant List Effective between the dates of 09/18/2020 and 09/17/2025

Applicable State Requirement: ECL 19-0301

Item 8.1:

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

CAS No: 007664-39-3 Name: HYDROGEN FLUORIDE

CAS No: 016984-48-8 Name: FLUORIDE

CAS No: 018540-29-9 Name: CHROMIUM(VI)

CAS No: 0NY075-00-0



Facility DEC ID: 9290900018

Name: PARTICULATES

CAS No: 0NY998-00-0 Name: VOC

Condition 9: Malfunctions and start-up/shutdown activities Effective between the dates of 09/18/2020 and 09/17/2025

Applicable State Requirement: 6 NYCRR 201-1.4

Item 9.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

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

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

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

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

Condition 10: Emission Unit Definition Effective between the dates of 09/18/2020 and 09/17/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Air Pollution Control Permit Conditions Page 15 FINAL



Facility DEC ID: 9290900018

Item 10.1:

The facility is authorized to perform regulated processes under this permit for: Emission Unit: C-AB07E

Emission Unit Description:

Two (2) Controlled Atmosphere Brazing lines to produce heat exchangers. Emission sources include a thermal degreaser with a thermal oxidizer, a brazing furnace with a wet scrubber and a cooling zone.

Building(s): BLDG07

Condition 11: Renewal deadlines for state facility permits Effective between the dates of 09/18/2020 and 09/17/2025

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

Item 11.1:

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

Condition 12: CLCPA Applicability Effective between the dates of 09/18/2020 and 09/17/2025

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

Item 12.1:

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

Condition 13: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

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

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Prior to the commencement of construction of new emission unit C-AB07E at the existing GMCH – Lockport facility that makes the facility subject to Title V permitting, the



Facility DEC ID: 9290900018

owner or operator of the facility subject to this provision has chosen to apply for a State facility permit pursuant to section 201-5.2 of this Part. Upon issuance, this permit shall authorize both construction and operation of the new emission unit until a Title V permit is issued in accordance with this Subpart. An application for a Title V permit is required within one year of the commencement of operation of the new emission unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

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

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

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

Division of Air Resources NYS Dept. of Environmental Conservation Region 9 270 Michigan Ave. Buffalo, NY 14203

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 15: Air pollution prohibited Effective between the dates of 09/18/2020 and 09/17/2025

Applicable State Requirement:6 NYCRR 211.1

Item 15.1:

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



Facility DEC ID: 9290900018

Condition 16: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

Applicable State Requirement:6 NYCRR 212-2.2

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s): CAS No: 018540-29-9 CHROMIUM(VI)

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description: Part 212 Evaluation – Chromium Emissions

> (1) Air contaminants listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant (HTAC) List shall either not exceed the mass emission limit (MEL) listed or demonstrate compliance with the air cleaning requirements as specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department.

(2) The facility emits chromium, specifically hexavalent chromium (Cr+6), which is listed in Table 2 as an HTAC with a MEL of 0.1 pounds per year (lb/yr), from four emission sources (BE1PC, BE2PC, DE1PC, & DE2PC) associated with this Air State Facility (ASF) permit and 16 emission sources (BANPC, BASPC, BBNPC, BBSPC, BINPC, BISPC, DANPC, DASPC, DBNPC, DBSPC, DINPC, DISPC, BDNPC, FDSPC, BKNPC,

& BKSPC) which are permitted under a separate ASF permit issued April 15, 2014. Upon issuance of this ASF permit the facility will be considered a major source that is subject to Title V permitting. A Title V permit application to combine the two active ASF permits must be submitted within one year of the commencement of operation of emission unit C-AB07E.

(3) The combined Emission Rate Potential (ERP) of Cr+6 from the four emission sources associated with this ASF permit is 8.15x10E-5 pounds per hour (lb/hr) and 0.714 lb/yr. The expected actual annual emission is 0.338 lb/yr, which exceeds the MEL. The combined ERP of Cr+6 from all 20 emission points is 3.39E-4 lb/hr and 2.97 lb/yr. The expected facility-wide actual annual emission is 1.40

Facility DEC ID: 9290900018

lb/yr, which exceeds the MEL.

(4) A technical review of the facility-wide Cr+6 emission calculations submitted by GMCH Lockport was conducted in accordance with the NYSDEC guidance document "DAR-1: Guidelines for the Evaluation and Control of Ambient Air Contaminants under Part 212". Since the MEL is exceeded, GMCH must demonstrate compliance with the air cleaning requirements as specified in Subdivision 212-2.3(b), Table 4. The Department has assigned an environmental rating (ER) of "A" to Cr+6. For the documented Cr+6 ERP of 3.39E-4 lb/hr, Table 4 sets the degree of required air cleaning at a level in which air dispersion modeling demonstrates that the maximum offsite air concentration is less than the applicable short-term (SGC) and annual (AGC) guideline concentrations found in the DAR-1. Per DAR-1, Cr+6 is assigned an AGC of 2.0E-5 ug/m3; there is no SGC.

(5) GMCH modeled facility-wide Cr+6 emissions via the AERMOD air dispersion modeling program per the approved modeling protocol and supplement prepared by Tetra Tech, Inc. dated August 11, 2020, and September 4, 2020, respectively. Final model results were submitted via a report prepared by Tetra Tech, Inc., dated September 10, 2020. The maximum offsite air concentration predicted by the model exceeded the AGC, necessitating the completion of a Best Available Control Technology for Toxics (T-BACT) Analysis per the guidelines of DAR-1 and a determination of whether the modeled impact was within the acceptable risk management range.

(6) The T-BACT Analysis, prepared by Trinity Consultants, Inc. and dated September 11, 2020, demonstrated that the process emission sources are being controlled similar to the best controlled emission source in the applicable source category.

7) Per DAR-1, the acceptable risk management range for the predicted maximum offsite concentration of non-criteria air contaminants identified as carcinogens must be less than 10-in-a-million excess cancer risk; thus, the maximum predicted concentration of Cr+6 for the facility must be less than 10 times the AGC, which is 20.0E-5 ug/m3. The maximum offsite concentration of Cr+6 for the facility as predicted by the model is 19.16E-5 ug/m3 which is within the acceptable risk management range.

(8) Prior to any change in operational parameters which could cause an increase in Cr+6 emissions, the impacts associated with the planned increase in emissions must be re-evaluated and reported to the Regional Air Pollution



Facility DEC ID: 9290900018

Control Engineer.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

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

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):	
CAS No: 016984-48-8	FLUORIDE
CAS No: 007664-39-3	HYDROGEN FLUORIDE

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

> Prior to the start of operations, the permittee shall develop an operating plan for the wet scrubber system (emission sources BE1PC & BE2PC) that defines the flow rates, pressure drops and/or other parameters critical to proper operation of the scrubber system, in accordance with manufacturer's recommendations. The operating plan must be submitted to DEC and include a proposed monitoring and recordkeeping schedule. The permittee will monitor and record the critical operating parameters as defined in the operating plan on a schedule acceptable to DEC.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration Effective between the dates of 09/18/2020 and 09/17/2025

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

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s): CAS No: 016984-48-8 FLUORIDE CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 18.2:



Facility DEC ID: 9290900018

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description: Part 212 Evaluation – Hydrogen Fluoride and Total

Fluoride Emissions

(1) Neither hydrogen fluoride (HF) nor total fluoride (F) are classified as a High Toxicity Air Contaminant (HTAC) in Table 2 of 6 NYCRR Part 212.2, so both are classified as a non-HTAC. Department guidance, known as DAR-1, requires each non-HTAC emitted from process sources with an ERP greater than 100 pounds per year (lb/yr), facility-wide, to demonstrate compliance with the requirements of 6 NYCRR Part 212. The 2566 lb/yr and 2617 lb/yr ERPs of HF and F, respectively, are both greater than 100 lb/yr and must be evaluated.

(2) The facility emits HF and F from two emission sources (BE1PC & BE2PC) associated with this Air State Facility (ASF) permit and 10 emission sources (BANPC, BASPC, BBNPC, BBSPC, BINPC, BISPC, BKNPC, BKSPC, BDNPC, & BDSPC) which are permitted under a separate ASF permit issued April 15, 2014. The 12 emission sources are brazing furnace wet scrubbers. Upon issuance of this ASF permit the facility will be considered a major source that is subject to Title V permitting. A Title V permit application to combine the two active ASF permits must be submitted within one year of the commencement of operation of emission unit C-AB07E.

(3) Each of the 12 emission sources, which are brazing furnace wet scrubbers, control HF and F emissions at a minimum rate of 85% overall removal efficiency.

(4) The total uncontrolled Emission Rate Potential (ERP) of HF from the two emission sources associated with this ASF permit is 0.0318 pounds per hour (lb/hr) and 279.0 lb/yr. The expected annual post-control emission is 41.8 lb/yr. The combined total uncontrolled ERP of HF from all 12 emission points is 0.293 lb/hr and 2566.4 lb/yr. The expected facility-wide annual post-control emission is 385.0 lb/yr.

(5) The total uncontrolled Emission Rate Potential (ERP) of F from the two emission sources associated with this ASF permit is 0.0332 pounds per hour (lb/hr) and 290.4 lb/yr. The expected annual post-control emission is 43.6 lb/yr. The combined total uncontrolled ERP of F from all 12 emission points is 0.305 lb/hr and 2671.4 lb/yr. The expected facility-wide annual post-control is 400.7 lb/yr.

Facility DEC ID: 9290900018

(6) A technical review of the facility-wide HF and F emission calculations submitted by GMCH Lockport was conducted in accordance with the NYSDEC guidance document "DAR-1: Guidelines for the Evaluation and Control of Ambient Air Contaminants under Part 212". The Department has assigned environmental ratings (ER) of "B" to both HF and F. GMCH must demonstrate compliance with the air cleaning requirements as specified in Subdivision 212-2.3(b), Table 4. For the documented HF and F ERPs of 0.293 and 0.305 lb/hr, respectively, Table 4 sets the degree of required air cleaning at a level which air dispersion modeling demonstrates that the maximum offsite air concentration is less than the applicable short-term (SGC) and annual (AGC) guideline concentrations found in the DAR-1. Per DAR-1, HF is assigned an AGC of 0.071 ug/m3 and an SGC of 5.6 ug/m3. "Equivalent" annual and 1-hour F standards are established per DAR-1 and 6NYCRR Subpart 257-4 as 0.067 ug/m3 and 5.3 ug/m3, respectively.

(7) GMCH modeled facility-wide HF and F emissions, after control, via the AERMOD air dispersion modeling program per the approved modeling protocol and supplement prepared by Tetra Tech, Inc. dated August 11, 2020 and September 4, 2020, respectively. Final model results were submitted via a report prepared by Tetra Tech, Inc., dated September 10, 2020. The maximum offsite air concentrations of HF and F predicted by the model were compared to the AGCs and SGCs, using the guidelines contained within DAR-1, and were determined to comply with Part 212 control requirements.

(8) Continued compliance will be assured by surrogate parametric monitoring per the wet scrubber operating plan as detailed in another monitoring condition in this permit under a Part 212-2.3(b) citation.

(9) Prior to any change in operational parameters which could cause an increase in HF and F emissions, the impacts associated with the planned increase in emissions must be re-evaluated and reported to the Regional Air Pollution Control Engineer.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Facility DEC ID: 9290900018

**** Emission Unit Level ****

Condition 19: Emission Point Definition By Emission Unit Effective between the dates of 09/18/2020 and 09/17/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1:

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

Emission Unit: C-AB07E		
Emission Point: 7E101 Height (ft.): 49 NYTMN (km.): 4786.031	Diameter (in.): 22 NYTME (km.): 196.455	Building: BLDG07
Emission Point: 7E102 Height (ft.): 49 NYTMN (km.): 4786.031	Diameter (in.): 10 NYTME (km.): 196.455	Building: BLDG07
Emission Point: 7E103 Height (ft.): 41 NYTMN (km.): 4786.031	Diameter (in.): 36 NYTME (km.): 196.455	Building: BLDG07
Emission Point: 7E104 Height (ft.): 41 NYTMN (km.): 4786.031	Diameter (in.): 36 NYTME (km.): 196.455	Building: BLDG07
Emission Point: 7E105 Height (ft.): 41 NYTMN (km.): 4786.031	Diameter (in.): 36 NYTME (km.): 196.455	Building: BLDG07
Emission Point: 7E201 Height (ft.): 49 NYTMN (km.): 4786.031	Diameter (in.): 22 NYTME (km.): 196.455	Building: BLDG07
Emission Point: 7E202 Height (ft.): 49 NYTMN (km.): 4786.031	Diameter (in.): 10 NYTME (km.): 196.455	Building: BLDG07
Emission Point: 7E203 Height (ft.): 41 NYTMN (km.): 4786.031	Diameter (in.): 36 NYTME (km.): 196.455	Building: BLDG07
Emission Point: 7E204 Height (ft.): 41 NYTMN (km.): 4786.031	Diameter (in.): 36 NYTME (km.): 196.455	Building: BLDG07
Emission Point: 7E205 Height (ft.): 41 NYTMN (km.): 4786.031	Diameter (in.): 36 NYTME (km.): 196.455	Building: BLDG07



Facility DEC ID: 9290900018

Condition 20: Process Definition By Emission Unit Effective between the dates of 09/18/2020 and 09/17/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 20.1:

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

Emission Unit: C-AB07E Process: 7E1 Source Classification Code: 3-09-042-00 Process Description: E-Zone, West (Line 1) Braze line to produce heat exchangers. (Controlled Atmosphere Braze Line similar to current processes 7AN, 7AS, 7BN, 7BS, 7IN and 7IS.)

Emission Source/Control: BE1PC - Control Control Type: WET SCRUBBER

Emission Source/Control: DE1PC - Control Control Type: THERMAL OXIDATION

Emission Source/Control: BE1XX - Process

Emission Source/Control: CE1XX - Process

Emission Source/Control: DE1XX - Process

Item 20.2:

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

Emission Unit: C-AB07E Process: 7E2 Source Classification Code: 3-09-042-00 Process Description: E-Zone, East (Line 2) Braze line to produce heat exchangers. (Controlled Atmosphere Braze Line similar to current processes 7AN, 7AS, 7BN, 7BS, 7IN and 7IS.)

Emission Source/Control: BE2PC - Control Control Type: WET SCRUBBER

Emission Source/Control: DE2PC - Control Control Type: THERMAL OXIDATION

Emission Source/Control: BE2XX - Process

Emission Source/Control: CE2XX - Process

Emission Source/Control: DE2XX - Process



Facility DEC ID: 9290900018