

Facility DEC ID: 9291200247

**PERMIT
Under the Environmental Conservation Law (ECL)**

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
 Permit ID: 9-2912-00247/00001
 Effective Date: _____ Expiration Date: _____

Permit Issued To: TAYLOR DEVICES INC
 90 TAYLOR DR
 PO BOX 748
 NORTH TONAWANDA, NY 14120

Contact: Tim Sopko
 90 Taylor Dr
 PO Box 748
 North Tonawanda, NY 14120
 (716) 799-0293

Facility: TAYLOR DEVICES INC - NORTH
 1 BUFFALO BOLT WAY
 NORTH TONAWANDA, NY 14120

Description:
 This is a renewal of the Air State Facility permit issued to Taylor Devices Inc. under DEC ID: 9291200247. This permit encompasses both addresses associated with Taylor Devices Inc. in North Tonawanda; 1 Buffalo Bolt Way and 90 Taylor Drive. Taylor Devices Inc. manufactures products used to absorb, control, or mitigate the motion of masses. This motion may be transient, such as caused motion by earthquakes or explosions, or steady state, such as caused by vibration or controlled power excitation. Products include, but are not limited to, fluid dampers, shock absorbers, liquid springs, crane bumpers, etc. This facility consists of four (4) buildings. Emission sources include spray coating, combustion, welding/brazing, machining, and abrasive blasting. The facility operates ten (10) nonexempt emissions points including nine (9) paint booths and one abrasive blasting booth.

The coating process consists of applying various primers and paints, that may be mixed prior to application depending on part specifications, to various parts in one of nine (9) spray booths. Booths 1-6 are located in Building 2 (1 Buffalo Bolt Way), Booths 10-12 are located in Building 4 (90 Taylor Drive). Paint Booths identified as Booth 7, Booth 8, and Booth 9 in previous permits have been removed.

Surface coating operations at the facility include Class B coating lines for miscellaneous metal parts and Class E coating lines for aerospace applications. The facility primarily sprays aerospace coatings. Aerospace coatings are defined as material applied to an aerospace vehicle or component to form a decorative, protective, functional solid film or the solid film itself. The facility's actual emissions of volatile organic compounds (VOC) are less than 50 tons per year, therefore the facility is not

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subject to the “as applied’ limits for those products which meet the aerospace coating definitions. Any coatings used at the facility that are not designated as aerospace coatings are subject to the as-applied VOC content limits of Table B4 in 6 NYCRR Part 228-1.4.

This permit contains federally enforceable emission caps to limit toluene, a hazardous air pollutant (HAP), to less than the 10-ton major source threshold during any consecutive twelve-month period for a single HAP, and to limit VOC to less than the 50-ton major source threshold during any consecutive twelve-month period. These emission caps will establish the facility as an area source and therefore not subject to the Title V permitting requirements of 6 NYCRR Part 201-6. The facility shall use the toluene and VOC content of all coatings and solvents used on-site to calculate the 12-month rolling total of toluene and VOC emissions and submit annual reports to the New York State Department of Environmental Conservation (NYSDEC). The facility shall maintain records showing the toluene and VOC emission calculations for each month and the calculation of the 12-month rolling total toluene and VOC emissions for each month. These records are to be maintained on-site for a period of five years. An annual certification is to be submitted verifying compliance with the emissions cap for each consecutive twelve-month period of the calendar year.

This facility emits high toxicity air contaminants (HTACs) as identified by Table 2 in 6 NYCRR 212-2.2, including formaldehyde and methylene diphenyl diisocyanate (MDI). The actual annual emissions of MDI and formaldehyde were demonstrated to be below the respective mass emission limits (MELs) established in 6 NYCRR 212-2.2. No further Part 212 analysis was required for HTAC emissions. The facility shall maintain usage records of formaldehyde and MDI containing coatings and solvents and use these records to calculate emissions. Other pollutants emitted from surface coating operations at this facility are not A-rated contaminants, and are therefore not subject to the requirements of Part 212 per 6 NYCRR Part 212-1.4(l)

The coating operations are subject to the opacity limits of 6 NYCRR Part 228-1.3(a)(1). Emissions of A-rated contaminants from coating operations and emissions from the blast booth are subject to the opacity limits in 6 NYCRR Part 212-1.6(a) and the particulate limits in 6 NYCRR Part 212-2.4(b) The facility shall conduct monthly checks for visible emissions during operating hours to verify compliance with opacity limits. The visible emission checks will also serve to show compliance with the Part 212 particulate limits. The facility shall also perform visual determinations of fugitive emissions from the blast booth according to 40 CFR 63.11517(a) and (b).

The facility operates a vented enclosed abrasive blast booth to blast carbon steel and stainless steel. The dry abrasive blasting of carbon steel and stainless steel causes emissions of Metal Fabricating Hazardous Air Pollutants (MFHAPs), making the facility subject to 40 CFR 63 Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. Per 40 CFR 63.11516(2)(i), emissions from the blast booth must be captured and vented to a filtration control device. The blast booth is equipped with a dust collector and HEPA filters. The facility shall operate all equipment associated with dry abrasive blasting operations according to manufacturer's

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instructions. Per 40 CFR 63.11516(2)(ii) the facility shall implement the management practices to minimize emissions including take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions.

Exempt sources operated at this facility include handheld machining/grinding exempt under 6 NYCRR Part 201-3.3(c)(52), handheld welding and soldering exempt under 201-3.2(c)(35), tumble blasting exempt under 201-3.2(c)(35), and combustion units with a maximum heat rating input under 10 MMbtu/hr exempt under 201-3.2(c)(1). The facility operates an open-top vapor degreaser with an open-top area greater than 11 square feet. The degreaser is exempt from the requirements of Part 226 as non-VOC solutions are used. The facility operates an oil dip tank that is equipped with a mist eliminator. The oil dip tank creates steam but is not expected to produce emissions.

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: LISA M CZECHOWICZ
NYSDEC - REGION 9
700 Delaware Ave
BUFFALO, NY 14209

Authorized Signature: _____ Date: ___ / ___ / ___

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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.

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DEC GENERAL CONDITIONS

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Facility Level

- 7 5 Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

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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.

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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

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: TAYLOR DEVICES INC
90 TAYLOR DR
PO BOX 748
NORTH TONAWANDA, NY 14120

Facility: TAYLOR DEVICES INC - NORTH
1 BUFFALO BOLT WAY
NORTH TONAWANDA, NY 14120

Authorized Activity By Standard Industrial Classification Code:
3593 - FLUID POWER CYLINDERS AND ACTUATORS

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- 6 *2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 8 *3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 9 4 6 NYCRR 211.2: Visible Emissions Limited
- 10 5 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 11 6 6 NYCRR 212-2.4 (b): Compliance Demonstration

Emission Unit Level

EU=1-BLAST

- 12 7 40CFR 63.11516(a), Subpart XXXXXX: Compliance Demonstration
- 13 8 40CFR 63.11517, Subpart XXXXXX: Compliance Demonstration

EU=1-PAINT

- 14 9 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 16 10 6 NYCRR 228-1.3 (b): Compliance Demonstration
- 16 11 6 NYCRR 228-1.3 (c): Compliance Demonstration
- 17 12 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 18 13 6 NYCRR 228-1.3 (e): Compliance Demonstration
- 19 14 6 NYCRR 228-1.4 (b) (4): Compliance Demonstration

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- 22 15 ECL 19-0301: Contaminant List
- 23 16 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 24 17 6 NYCRR Subpart 201-5: Emission Unit Definition
- 24 18 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 24 19 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 25 20 6 NYCRR 211.1: Air pollution prohibited
- 25 21 6 NYCRR 212-2.2: Compliance Demonstration
- 26 22 6 NYCRR 212-2.2: Compliance Demonstration

Emission Unit Level

- 27 23 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 28 24 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/DRAFT

**** 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,

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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

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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)

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 1.1:

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

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

CAS No: 000108-88-3	PTE: 19,900 pounds per year
Name: TOLUENE	

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

Condition 2: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 2.1:

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

6 NYCRR Subpart 201-6

Item 2.2:

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

Item 2.3:

The owner or operator of the permitted facility must maintain all required records on-site for a

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period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 2.4:

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

Item 2.5:

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

Item 2.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility-wide potential emissions of VOC are to be limited to less than 99,000 pounds during any twelve consecutive month period (determined on a rolling basis) in order to establish the facility as an area source and therefore avoid the Title V permitting requirements of 6 NYCRR Part 201-6. The VOC content of all coatings and solvents are to be used to calculate this rolling total, i.e. for each month the emissions of the current month plus the 11 previous months are summed. Records of the emissions calculations for each month and the calculation of the 12-month rolling total of emissions for each month are to be maintained on-site for a period of five years. These records shall be in a format easily verifiable and made available to New York State Department of Environmental Conservation (NYSDEC) representatives on request during reasonable business hours for the purpose of determining compliance.

An annual certification is to be submitted verifying compliance with the emissions cap for each consecutive twelve-month period of the calendar year. The report is to

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be submitted within 30 days after the end of the reporting period.

Parameter Monitored: VOC
 Upper Permit Limit: 99000 pounds per year
 Monitoring Frequency: MONTHLY
 Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 12 calendar month(s).

**Condition 3: Capping Monitoring Condition
 Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 3.1:

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

6 NYCRR Subpart 201-6

Item 3.2:

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

Item 3.3:

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

Item 3.4:

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

Item 3.5:

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

Item 3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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CAS No: 000108-88-3 TOLUENE

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility-wide potential emissions of toluene, a hazardous air pollutant, are to be limited to less than 19,900 pounds during any twelve consecutive month period (determined on a rolling basis) in order to establish the facility as an area source and therefore avoid the Title V permitting requirements of 6 NYCRR Part 201-6. The toluene content of all coatings and solvents are to be used to calculate this rolling total, i.e. for each month the emissions of the current month plus the 11 previous months are summed. Records of the emissions calculations for each month and the calculation of the 12-month rolling total of emissions for each month are to be maintained on-site for a period of five years. These records shall be in a format easily verifiable and made available to New York State Department of Environmental Conservation (NYSDEC) representatives on request during reasonable business hours for the purpose of determining compliance.

An annual certification is to be submitted verifying compliance with the emissions cap for each consecutive twelve month period of the calendar year. The report is to be submitted within 30 days after the end of the reporting period.

Parameter Monitored: TOLUENE

Upper Permit Limit: 19900 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 4: Visible Emissions Limited
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 211.2****Item 4.1:**

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.

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Condition 5: Compliance Demonstration
Effective for entire length of Permit

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

Item 5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of A-rated contaminants from coating operations and emissions from the blast booth are subject to the opacity limitations of 6 NYCRR Part 212-1.6(a) and shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except only the emission of uncombined water. New York State Department of Environmental Conservation (NYSDEC) reserves the right to perform or require the performance of an EPA Method 9 opacity evaluation at any time during facility operation.

The facility shall conduct a monthly visible emissions (VE) survey of the spray booth exhaust(s) and blast booth when operating. Normal operation of these processes should not result in visible emissions. If visible emissions are observed, a visible emissions survey will then be conducted on start-up of that booth and if visible emissions are still observed, the booth shall be shut-down for maintenance until such time that there are no visible emissions observed on start-up.

After corrective actions are complete, an additional visual observation of the emission point shall be made the following calendar day to see if visible emissions are still occurring. If visible emissions (other than condensing moisture or steam) are observed for 2 consecutive calendar days, a Method 9 test shall be conducted within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity. The facility shall notify NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site in a bound logbook and

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include the date, time, observer’s name, weather conditions and a description of the observations (steam, visible emissions, etc.). These records shall be kept on site for a period of 5 years from the date of the last entry. Should NYSDEC determine that the record keeping format is inadequate to demonstrate compliance, it shall provide written notice stating the inadequacies, the facility shall have 90 days to revise its prospective record keeping format in a manner acceptable to NYSDEC.

Compliance with this condition will serve to demonstrate compliance with the particulate emission standard of 6 NYCRR Part 212.4(c) which prohibits particulate emissions in excess of 0.05 gr/dscf.

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

**Condition 6: Compliance Demonstration
 Effective for entire length of Permit**

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

Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 6.2:

Compliance Demonstration shall include the following monitoring:

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

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.

Compliance with this standard shall be demonstrated through the visible emissions limitations incorporated into this permit under 6 NYCRR Part 212-1.6(a).

Parameter Monitored: PARTICULATES
 Upper Permit Limit: 0.05 grains per dscf
 Reference Test Method: EPA Method 5

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 7: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.11516(a), Subpart XXXXXX

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BLAST

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility operates a vented enclosed abrasive blast booth to blast carbon steel and stainless steel. The dry abrasive blasting of carbon steel and stainless steel causes emissions of Metal Fabricating Hazardous Air Pollutants (MFHAPs), making the facility subject to 40 CFR 63 Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

Per 40 CFR 63.11516(a)(2)(i), emissions from the blast booth must be captured and vented to a filtration control device. The facility has equipped the blast booth with a dust collector and HEPA filters. The facility shall operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions. The facility shall maintain records onsite of manufacturer's instructions and a description of all equipment associated with the blasting operation. These records shall be made available to NYSDEC upon request.

The facility shall implement practices to minimize excess dust in the area surrounding the blast booth to reduce MFHAP emissions as specified in 40 CFR 63.11516(a)(2)(ii)(A) through (C). These measures include:

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- (A) take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
- (B) enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and
- (C) operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

Per 40 CFR 63.11519(b), the facility shall prepare and submit annual compliance reports to the NYSDEC that certify compliance with the requirements of 40 CFR 63.11516. The annual compliance reports shall be postmarked by January 30th for the previous calendar year and include the following:

- (i) Company name and address;
- (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
- (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31.

The facility shall maintain records of these reports on-site for five years from the latest entry and make the reports available to NYSDEC upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 8: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.11517, Subpart XXXXXX

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BLAST

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Per 40 CFR 63.11517, the facility shall perform visual determinations of fugitive emissions from the dry abrasive

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blast booth according to the graduated schedule described in 40 CFR 63.11517(b). Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22 of 40 CFR part 60 Appendix A-7. EPA Method 22 tests must be conducted while the blast booth is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.

Per 40 CFR 63.11519(b), the facility shall prepare and submit annual compliance reports to the NYSDEC that certify compliance with the requirements of 40 CFR 63.11517. The facility shall maintain records of these reports on-site for five years from the latest entry and make the reports available to NYSDEC upon request.

The annual compliance reports shall be postmarked by January 30th for the previous calendar year and include the following:

- (i) Company name and address;
- (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
- (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31.
- (iv) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
- (v) A description of the corrective actions taken subsequent to the test; and
- (vi) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

Reference Test Method: EPA Method 22

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 9: Compliance Demonstration
Effective for entire length of Permit**

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

Item 9.1:

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The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Item 9.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

This facility is subject to the opacity limitations of 6 NYCRR Part 228-1.3(a) and shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any surface coating process emission source or emission point, except only the emission of uncombined water. All nine (9) spray booths operated at the facility are subject the opacity limitation of 6 NYCRR Part 228-1.3(a). The New York State Department of Environmental Conservation (NYSDEC) reserves the right to perform or require the performance of an EPA Method 9 opacity evaluation at any time during facility operation.

The facility shall conduct a monthly visible emissions (VE) survey of the spray booth exhaust(s) when operating. Normal operation of spray booths should not result in visible emissions. If visible emissions and/or fallout are observed, the permittee shall replace the affected spray booth filters. A visible emissions survey will then be conducted on start-up of that booth and if visible emissions are still observed, the booth shall be shut-down for maintenance until such time that there are no visible emissions or fall-out observed on start-up.

After corrective actions are complete, an additional visual observation of the emission point shall be made the following calendar day to see if visible emissions are still occurring. If visible emissions (other than condensing moisture or steam) are observed for 2 consecutive calendar days, a Method 9 test shall be conducted within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity. The facility shall notify NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site in a bound logbook and include the date, time, observer's name, weather conditions and a description of the observations (steam, visible emissions, etc.). These records shall be kept on

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site for a period of 5 years from the date of the last entry. Should NYSDEC determine that the record keeping format is inadequate to demonstrate compliance, it shall provide written notice stating the inadequacies, the facility shall have 90 days to revise its prospective record keeping format in a manner acceptable to NYSDEC.

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

**Condition 10: Compliance Demonstration
 Effective for entire length of Permit**

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

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6 NYCRR Part 228-1 must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department within 90 days of receiving the request. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department. All records required by this paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 11: Compliance Demonstration
 Effective for entire length of Permit**

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Facility DEC ID: 9291200247

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

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 12: Compliance Demonstration
Effective for entire length of Permit**

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

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

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Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- Within the work area(s) associated with a coating line, the owner operator of a facility subject to this Subpart must:
- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
 - (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
 - (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
 - (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
 - (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
 - (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
 - (g) clean hand held spray guns by one of the following:
 - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 13: Compliance Demonstration
Effective for entire length of Permit**

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

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Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Per 6 NYCRR Part 228-1.3(e), Class B coating lines at the facility must use one or more of the following application techniques to apply the coating:

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;
- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;
- (vii) airless spray, (including air assisted);
- (viii) airbrush application methods for stenciling, lettering, and other identification markings; or
- (ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 14: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 228-1.4 (b) (4)

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT

Item 14.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Surface coating operations at the facility include Class B coating lines for miscellaneous metal parts as described in Table 1 of 6 NYCRR Part 228-1.1(a)(1). The actual annual emissions of volatile organic compounds (VOCs) from all sources at this facility regardless of process type

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but excluding combustion installations, exceeds 3 tons. The Class B coating operations are subject to the “as applied” limits in 6 NYCRR Part 228-1.4(b)(4) Table B4 for miscellaneous metal parts. The maximum permitted pounds of VOC per gallon for air-dried extreme performance coatings is 3.5 pounds per gallon. This limit does not apply to Class E aerospace coating lines.

As per 6 NYCRR Part 228-1.6(a), the owner or operator of any emission source subject to this Subpart must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each "as applied" coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the Department. All records required must be maintained at the facility for a period of five years.

The owner and operator of any emission source subject to this Part must, upon request by NYSDEC, use Method 24 as presented in Appendix A of both 40 CFR Parts 63 and 60, to measure the volatile content, water content, density, volume of solids, and weight of solids to determine the actual VOC content of an as applied coating during a compliance demonstration. Alternate sampling and analysis methods can be used, subject to the approval of the NYSDEC and the administrator. Representatives of NYSDEC must be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with this Subpart.

Any information or record showing noncompliance with the requirements of this Part must be reported to the department within 30 days following notice or generation of the information or record.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: Method 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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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

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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 15: Contaminant List
Effective for entire length of Permit

Applicable State Requirement: ECL 19-0301

Item 15.1:

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

CAS No: 000050-00-0
Name: FORMALDEHYDE

CAS No: 000101-68-8
Name: METHYLENE BISPHENYL ISOCYANATE

CAS No: 000108-88-3
Name: TOLUENE

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

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

Condition 16: Malfunctions and Start-up/Shutdown Activities
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 201-1.4

Item 16.1:

(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.

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Condition 17: Emission Unit Definition
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1:

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

Emission Unit: 1-BLAST

Emission Unit Description:

The facility operates a vented enclosed abrasive blast booth to blast carbon steel and stainless steel. The dry abrasive blasting of carbon steel and stainless steel results in emissions of Metal Fabricating Hazardous Air Pollutants (MFHAPs).

Building(s): Bldg2

Item 17.2:

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

Emission Unit: 1-PAINT

Emission Unit Description:

Emission Unit 1-Paint consists of room spray booths, used to apply coatings to a variety of parts. Only 2 booths operate at one time due to pressure limitations in Building 2. Up to three spray booths can operate at one time in Building 4. The coatings to be applied consist of various primers and paints that may be mixed prior to application depending on part specifications. The coatings as applied are subject to the VOC-content restrictions outlined in 6 NYCRR 228-1. The spray booths are vented outdoors through panel filters.

Building(s): Bldg2
 Bldg4

Condition 18: Renewal deadlines for state facility permits
Effective for entire length of Permit

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

Item 18.1:

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 19: Compliance Demonstration
Effective for entire length of Permit

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

Item 19.1:

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The Compliance Demonstration activity will be performed for the Facility.

Item 19.2:

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: UPON REQUEST BY REGULATORY AGENCY

**Condition 20: Air pollution prohibited
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 211.1

Item 20.1:

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 21: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 212-2.2

Item 21.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000101-68-8 METHYLENE BISPHENYL ISOCYANATE

Item 21.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

For an air contaminant listed in 6 NYCRR 212-2.2 Table 2

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– High Toxicity Air Contaminant List, the facility owner or operator shall limit the actual annual emissions from all process operations at the facility to not exceed the mass emission limit listed for an individual high toxicity air contaminant (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 6 NYCRR Part 212-2.3(b), Table 4 – degree of air cleaning required for non-criteria air contaminants.

The facility uses coatings that contain methylene diphenyl diisocyanate (MDI). MDI is a HTAC, as established in Table 2 - High Toxicity Air Contaminant List in 6 NYCRR Part 212-2.2. Emissions of MDI shall not exceed the Mass Emission Limit (MEL) of 100 lbs/year established in Part 212-2.2. Emission calculations submitted to the NYSDEC on November 7, 2022 demonstrated compliance with the MEL of 100 lbs/year. Actual MDI emissions are estimated at 28.3 lbs/year.

The facility shall employ spray booth filters having efficiencies sufficient to capture fine particulate aerosols generated during the coating process. The currently implemented panel filters manufactured by Tri-Dim are sufficient to control these fine particles. Proper spray application techniques shall be utilized to minimize overspray and the production of polymeric isocyanate aerosols.

Records shall be maintained identifying filter type, manufacturer, efficiency, and quantity of MDI coatings used at the facility. A change in the current filter system used shall be documented and an equivalent filter system employed. The MDI usage records shall be used to calculate monthly MDI emissions and 12 month rolling emissions total 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.

Parameter Monitored: METHYLENE BISPHENYL ISOCYANATE

Upper Permit Limit: 100 pounds per year

Monitoring Frequency: CONTINUOUS

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 22: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 212-2.2

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Facility DEC ID: 9291200247

Item 22.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 22.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

For an air contaminant listed in 6 NYCRR 212-2.2 Table 2 – High Toxicity Air Contaminant List, the facility owner or operator shall limit the actual annual emissions from all process operations at the facility to not exceed the mass emission limit listed for an individual high toxicity air contaminant (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 6 NYCRR Part 212-2.3(b), Table 4 – Degree of Air Cleaning Required for non-criteria air contaminants.

Records shall be maintained that demonstrate the quantity of formaldehyde containing coatings used at the facility. The formaldehyde usage records shall be used to calculate monthly formaldehyde emissions and 12 month rolling emissions total 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.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 100 pounds per year

Monitoring Frequency: CONTINUOUS

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 23: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 23.1:

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

Emission Unit: 1-PAINT

Permit ID: 9-2912-00247/00001

Facility DEC ID: 9291200247

Emission Point: 00001			
Height (ft.): 25	Diameter (in.): 36		
NYTMN (km.): 4772.738	NYTME (km.): 183.581	Building: Bldg2	
Emission Point: 00002			
Height (ft.): 25	Diameter (in.): 36		
NYTMN (km.): 4772.738	NYTME (km.): 183.581	Building: Bldg2	
Emission Point: 00003			
Height (ft.): 25	Diameter (in.): 36		
NYTMN (km.): 4772.738	NYTME (km.): 183.581	Building: Bldg2	
Emission Point: 00004			
Height (ft.): 25	Diameter (in.): 36		
NYTMN (km.): 4772.738	NYTME (km.): 183.581	Building: Bldg2	
Emission Point: 00005			
Height (ft.): 25	Diameter (in.): 36		
NYTMN (km.): 4772.738	NYTME (km.): 183.581	Building: Bldg2	
Emission Point: 00006			
Height (ft.): 25	Diameter (in.): 36		
NYTMN (km.): 4772.738	NYTME (km.): 183.581	Building: Bldg2	
Emission Point: 00010			
Height (ft.): 32	Diameter (in.): 42		
NYTMN (km.): 4772.738	NYTME (km.): 183.581	Building: Bldg4	
Emission Point: 00011			
Height (ft.): 32	Diameter (in.): 42		
NYTMN (km.): 4772.738	NYTME (km.): 183.581	Building: Bldg4	
Emission Point: 00012			
Height (ft.): 32	Diameter (in.): 42		
NYTMN (km.): 4772.738	NYTME (km.): 183.581	Building: Bldg4	

**Condition 24: Process Definition By Emission Unit
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1:

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

Emission Unit: 1-BLAST
 Process: BLT Source Classification Code: 1-01-001-01
 Process Description:
 The facility operates a vented enclosed abrasive blast booth to blast carbon steel and stainless steel.
 The dry abrasive blasting of carbon steel and stainless steel causes emissions of Metal Fabricating Hazardous Air

Permit ID: 9-2912-00247/00001

Facility DEC ID: 9291200247

Pollutants (MFHAPs).

Emission Source/Control: 000B1 - Process

Item 24.2:

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

Emission Unit: 1-PAINT

Process: SPO

Source Classification Code: 4-02-025-01

Process Description:

The coating process (SPO) consists of application of coatings to various parts in 9 spray booths. The coatings applied consist of various primers and paints that may be mixed prior to application depending on part specifications. The coatings as applied are subject to the VOC-content restrictions outlined in 6 NYCRR 228-1.

Emission Source/Control: PSV01 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV02 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV03 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV04 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV05 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV06 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV10 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV11 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: PSV12 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00001 - Process

Emission Source/Control: 00002 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00004 - Process

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Facility DEC ID: 9291200247

Emission Source/Control: 00005 - Process

Emission Source/Control: 00006 - Process

Permit ID: 9-2912-00247/00001

Facility DEC ID: 9291200247