



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2930-00049/00007
Effective Date: 07/06/2017 Expiration Date: 07/05/2027

Permit Issued To: AAVID NIAGARA LLC
3315 HASELEY DR
NIAGARA FALLS, NY 14304

Contact: DAVID D FREGELETTE
NDM/KINTEX COMPANY
3315 HASELEY DRIVE
NIAGARA FALLS, NY 14304
(716) 297-0652

Facility: AAVID NIAGARA LLC
3315 HASELEY DR
NIAGARA FALLS, NY 14304

Description:

Primary operations at the Aavid Niagara LLC facility include manufacturing of aluminum heat exchangers for aircraft, marine, military and off road vehicles. Other operations include welding, cutting, brazing, degreasing, machining, chromicoat, and painting.

The facility is organized into three emission units with a total of three emission points.

Emission unit U-COAT1 includes a parts cleaning and chromic coating processes which exhaust through emission point 00002 & 00005, respectively. The process is subject to the management, recordkeeping and reporting provisions of 40CFR 63, Subpart WWWW National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations.

Emission unit U-PAINT includes a parts painting process which takes place in a paint booth exhausting through paint arrestors and emission point 00004. The process is subject to the operational, recordkeeping, recording and volatile organic compound (VOC) content limits per 6NYCRR Subpart 228-1 for Class B Miscellaneous Metal Parts Coating Operations.



Emission unit U-DEGRE includes the trichloroethylene degreasing operation which has fugitive emissions. The facility will continue to operate the degreaser in compliance with the applicable requirements of 40CFR Part 63, Subpart T. The degreaser is not subject to 6NYCRR Part 226 due to the exemption found at §226.6(a). The batch vapor cleaning machine has a solvent - air interface of 30 square feet and the facility will comply with the overall emission limit contained in the regulation. The rule states that a machine this size has an overall emission limit of 30.7 lbs solvent / square foot solvent - air interface / month which must be calculated on a three month rolling average. An annual emission report must be submitted on an annual basis.

Facility emissions qualified the facility for issuance of an Air Facility Registration Certificate, however, the reported facility emission rate of one persistent, bioaccumulative and toxic compound (trichloroethylene) per Table 1 of 6NYCRR Subpart 201-9 greater than the significant mass emission rate of 1000 pounds per year required the facility to obtain this Air State Facility Permit. Also, trichloroethylene is a high toxicity air contaminant (HTAC) with a mass emission limit of 500 pounds per year per Section 212-2.2 Table 2. Therefore, Aavid must perform a Toxic – Best Available Control Technology (T-BACT) analysis for the trichloroethylene degreasing equipment in order to assure compliance with 6NYCRR Part 212. Aavid must submit the T-BACT analysis to the Regional Air Pollution Control Engineer no later than December 31, 2017. Accompanying the analysis must be a timetable for decision making and implementation which must occur by December 31, 2018.

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

DEC Permit Conditions
Renewal 1/FINAL



DIVISION OF ENVIRONMENTAL PERMITS
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- 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.

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.



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

New York State Department of Environmental Conservation

Permit ID: 9-2930-00049/00007

Facility DEC ID: 9293000049



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To:AAVID NIAGARA LLC
3315 HASELEY DR
NIAGARA FALLS, NY 14304

Facility: AAVID NIAGARA LLC
3315 HASELEY DR
NIAGARA FALLS, NY 14304

Authorized Activity By Standard Industrial Classification Code:
3443 - FABRICATED PLATE WORK (BOILER SHOPS)

Permit Effective Date: 07/06/2017

Permit Expiration Date: 07/05/2027



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 200.7: Maintenance of Equipment
- 3 6 NYCRR 201-1.7: Recycling and Salvage
- 4 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 5 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 6 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 7 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

EU=U-COAT1,Proc=CHR,ES=ES005

- 8 40CFR 63.11507(g), Subpart WWWW: Compliance Demonstration
- 9 40CFR 63.11509(c), Subpart WWWW: Compliance Demonstration

EU=U-DEGRE

- 10 6 NYCRR 212-1.5 (d): Compliance Demonstration
- 11 40CFR 63, Subpart T: Compliance Demonstration

EU=U-PAINT

- 12 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 13 6 NYCRR 228-1.3 (b): Compliance Demonstration
- 14 6 NYCRR 228-1.3 (c): Compliance Demonstration
- 15 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 16 6 NYCRR 228-1.3 (e): Surface Coating- application requirements
- 17 6 NYCRR 228-1.3 (e) (2): Compliance Demonstration
- 18 6 NYCRR 228-1.4 (b) (4): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 19 ECL 19-0301: Contaminant List
- 20 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 21 6 NYCRR Subpart 201-5: Emission Unit Definition
- 22 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 23 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 24 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

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



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,



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



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)



Condition 4: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 07/06/2017 and 07/05/2027

Applicable Federal Requirement:6 NYCRR 201-1.8

Replaces Condition(s) 8

Item 4.1:

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

Condition 5: Exempt Sources - Proof of Eligibility

Effective between the dates of 07/06/2017 and 07/05/2027

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

Replaces Condition(s) 10

Item 5.1:

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

Condition 6: Trivial Sources - Proof of Eligibility

Effective between the dates of 07/06/2017 and 07/05/2027

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

Replaces Condition(s) 11

Item 6.1:

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

Condition 7: Air pollution prohibited

Effective between the dates of 07/06/2017 and 07/05/2027

Applicable Federal Requirement:6 NYCRR 211.1

Item 7.1:

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.



**** Emission Unit Level ****

Condition 8: Compliance Demonstration
Effective between the dates of 07/06/2017 and 07/05/2027

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

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-COAT1

Process: CHR

Emission Source: ES005

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- (1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- (2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank.
- (3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank).
- (4) Use tank covers, if already owned and available at the facility.
- (5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).



The owner or operator of an affected tank that is subject to the management practices specified in 40CFR 63.11507(g) must state in his/her annual compliance certification that he/she has implemented the applicable management practices, as practicable.

Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

Any deviations from the compliance requirements specified in 40CFR 63 WWWW which occurred at an affected source during the year, must be reported by the owner or operator, along with the corrective action taken, and submit this report to the delegated authority.

The owner or operator must keep the records specified in paragraphs (1) through (3).

- (1) A copy of any Initial Notification and Notification of Compliance Status that was submitted and all documentation supporting those notifications.
- (2) The records specified in 40CFR 63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions.
- (3) The records required to show continuous compliance with each management practice and equipment standard that applies to the owner or operator, as specified in 40CFR 63.11508(d).

The owner or operator must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. He/she must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40CFR 63.10(b)(1). He/she may keep the records offsite for the remaining 3 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Compliance Demonstration
Effective between the dates of 07/06/2017 and 07/05/2027

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

New York State Department of Environmental Conservation

Permit ID: 9-2930-00049/00007

Facility DEC ID: 9293000049



Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-DEGRE

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Aavid must perform a Toxic – Best Available Control Technology (T-BACT) analysis for the trichloroethylene degreasing equipment in order to assure compliance with 6NYCRR Part 212 and the risk management policy for off-site ambient concentrations as described in DAR-1 Section F.1(c). Meeting the risk management policy can be addressed with a refined air dispersion analysis using AERMOD. Trichloroethylene is a high toxicity air contaminant (HTAC) and the Department identifies product substitution as a viable option to meet T-BACT. At a minimum, alternative solvents must be identified and determined if usage is feasible. Other T-BACT options may involve control technology.

Aavid must submit the T-BACT analysis to the Regional Air Pollution Control Engineer no later than December 31, 2017. Accompanying the analysis must be a timetable for decision making and implementation which must occur by December 31, 2018.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 11: Compliance Demonstration
Effective between the dates of 07/06/2017 and 07/05/2027

Applicable Federal Requirement:40CFR 63, Subpart T

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-DEGRE

Regulated Contaminant(s):
CAS No: 000079-01-6 TRICHLOROETHYLENE

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

Facility must operate the batch vapor solvent cleaning machine in compliance with the applicable requirements of 40 CFR Part 63, Subpart T, including all record keeping and reporting requirements. The batch vapor cleaning machine has a solvent - air interface of 30 square feet and the facility has opted to comply with the overall emission limit contained in §63.464(a)(1). The rule states that a machine this size has an overall emission limit of 150 kg solvent/square meter solvent - air interface/month (30.7 lbs solvent/square foot solvent - air interface/month) which must be calculated on a three month rolling average basis. The total annual emission rate cannot exceed 11052 lbs/yr or 5.526 tons/yr of trichloroethylene (TCE) solvent. This number is calculated by the following expression:

$$30.7 \text{ lbs/square foot interface/ month} \times 30 \text{ square feet} = 921 \text{ lbs/month} \times 12 = 11052 \text{ lbs/ yr or } 5.526 \text{ tons/yr TCE.}$$

Annual Emission Report:

Each owner or operator of a batch vapor solvent cleaning machine complying with the provisions of §63.464 shall submit a solvent emission report every year. This solvent emission report shall contain the requirements specified in paragraphs (1) through (3) of this condition.

- (1) The size and type of each unit subject to 40CFR 63, Subpart T (solvent/air interface area or cleaning capacity),
- (2) The average monthly solvent consumption for the solvent cleaning machine in kilograms or pounds per month, and
- (3) The 3-month monthly rolling average solvent emission estimates calculated each month using the method as described in §63.465(c).

Exceedance Report:

Each owner or operator of a batch vapor solvent cleaning machine shall submit an exceedance report to the Administrator semiannually except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under 40CFR 63.468(i) is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs (1) through (3) of this condition.



- (1) Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), if applicable. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels,
- (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken, and
- (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

This condition satisfies the facility requirements to comply with 6NYCRR Part 226 - Solvent Metal Cleaning Processes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 12: Compliance Demonstration
Effective between the dates of 07/06/2017 and 07/05/2027

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

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Item 12.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

The permittee will conduct observations of visible



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

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

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

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

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: MONTHLY
Averaging Method: 6-MINUTE AVERAGE (METHOD 22)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Compliance Demonstration
Effective between the dates of 07/06/2017 and 07/05/2027

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

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at



(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 07/06/2017 and 07/05/2027

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

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Item 15.2:

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 or operator of a facility subject to this Subpart must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with volatile organic compounds (VOC) solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless



equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

(g) clean hand held spray guns by one of the following:

- (1) an enclosed spray gun cleaning system that is kept closed when not in use;
- (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
- (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
- (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 16: Surface Coating- application requirements
Effective between the dates of 07/06/2017 and 07/05/2027**

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

Item 16.1:

This Condition applies to Emission Unit: U-PAINT

Item 16.2:

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

(i) flow/curtain coating;

(ii) dip coating;



Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The permittee owns/operates a Class B coating line for miscellaneous metal parts as described in 6NYCRR, Part 228-1.1(a)(1) Table 1. The annual actual volatile organic compounds (VOCs) from all sources at this facility regardless of process type, but excluding combustion installations, exceeds 3 tons.

Therefore, the coating operations are subject to the "as applied" limits in 228-1.4(b)(4) Table B4 for miscellaneous metal parts. The maximum permitted pounds of VOC per gallon minus water and excluded VOC of coating at application is 3.5 pounds per gallon, air-dried.

The VOC content limits for Class B coating lines can be met by averaging the VOC content of the materials used on a single surface coating unit each day ('i.e.', daily within- coating unit averaging).

As per 6NYCRR 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. The "as applied" VOC content is determined by Equation 1 as defined in Part 228-1.2(b)(125).

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.

The owner and operator of any emission source subject to this Part must, upon request by the Department, use Method 24 as presented in Appendix A of both 40 CFR Parts 63 and 60, respectively, to measure the volatile content, water content, density, volume of solids, and weight of solids in order 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 department and the

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administrator.

Representatives of the department 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. All records required must be maintained at the facility for a period of five years.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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.



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 19: Contaminant List
Effective between the dates of 07/06/2017 and 07/05/2027

Applicable State Requirement:ECL 19-0301

Item 19.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000079-01-6
Name: TRICHLOROETHYLENE

Condition 20: Malfunctions and start-up/shutdown activities
Effective between the dates of 07/06/2017 and 07/05/2027

Applicable State Requirement:6 NYCRR 201-1.4

Item 20.1:



(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 21: Emission Unit Definition
Effective between the dates of 07/06/2017 and 07/05/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 21.1:

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

Emission Unit: U-COAT1

Emission Unit Description:

This emission unit consists of two emission points associated with the cleaning and chromate conversion coating processes for aluminum heat exchangers. The emission points vent the aqueous cleaning, etching, rinse and coating tank baths used in this department.

Building(s): BUILDING 1

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Permit ID: 9-2930-00049/00007

Facility DEC ID: 9293000049



Item 21.2:

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

Emission Unit: U-DEGRE

Emission Unit Description:

This emission unit consists of fugitive emissions from the trichloroethylene degreasing equipment. The degreaser has a vapor trap freeboard chiller with a split cover that is closed at all times other than entry or exit of the degreasing basket and spray down of parts.

Building(s): BUILDING 1

Item 21.3:

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

Emission Unit: U-PAINT

Emission Unit Description:

This emission unit consists of one emission point associated with a paint booth exhaust. Aavid paints a limited number of products to meet customer specifications.

Building(s): BUILDING 1

Condition 22: Renewal deadlines for state facility permits
Effective between the dates of 07/06/2017 and 07/05/2027

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

Item 22.1:

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 23: Compliance Demonstration
Effective between the dates of 07/06/2017 and 07/05/2027

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

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 23.2:

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:

New York State Department of Environmental Conservation

Permit ID: 9-2930-00049/00007

Facility DEC ID: 9293000049



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 24: Visible Emissions Limited
Effective between the dates of 07/06/2017 and 07/05/2027

Applicable State Requirement:6 NYCRR 211.2

Replaces Condition(s) 20

Item 24.1:

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.

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

Condition 25: Emission Point Definition By Emission Unit
Effective between the dates of 07/06/2017 and 07/05/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1:

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

Emission Unit: U-COAT1

Emission Point: 00002

Height (ft.): 2 Diameter (in.): 18

NYTMN (km.): 4781.5 NYTME (km.): 177.2 Building: BUILDING 1

Emission Point: 00005

Height (ft.): 2 Diameter (in.): 18

NYTMN (km.): 4781.5 NYTME (km.): 177.2 Building: BUILDING 1

Item 25.2:

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

Emission Unit: U-PAINT

Emission Point: 00004

Height (ft.): 23 Diameter (in.): 24

NYTMN (km.): 4781.5 NYTME (km.): 177.2 Building: BUILDING 1

Condition 26: Process Definition By Emission Unit



Effective between the dates of 07/06/2017 and 07/05/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 26.1:

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

Emission Unit: U-COAT1
Process: CHR Source Classification Code: 3-09-016-99
Process Description:
This process encompasses the rinsing, etching and immersion of parts in a chromate conversion coating tank.

Emission Source/Control: ES005 - Process

Item 26.2:

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

Emission Unit: U-COAT1
Process: CLE Source Classification Code: 3-04-001-99
Process Description:
This process encompasses the cleaning of aluminum heat exchanger parts in an alkaline based cleaning tank to remove oil and residual dirt.

Emission Source/Control: ES002 - Process

Item 26.3:

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

Emission Unit: U-DEGRE
Process: DEG Source Classification Code: 4-01-002-22
Process Description:
The use of an electrically heated vapor degreaser for degreasing of aluminum heat exchanger parts. Surface:air interface on the degreaser is 30 square feet.

Emission Source/Control: ES006 - Process

Item 26.4:

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

Emission Unit: U-PAINT
Process: PAI Source Classification Code: 4-02-001-01
Process Description:
This process encompasses the painting of completed heat exchanger assemblies with VOC based paints. Paints are applied with a high volume low pressure (HVLP) paint guns

(Binkc SV100 and Devilbiss Cvi).

Emission Source/Control: ES04F - Control



Control Type: FABRIC FILTER

Emission Source/Control: ES004 - Process

