



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-5620-00040/02005
Effective Date: 06/09/2015 Expiration Date: 06/08/2025

Permit Issued To: API HEAT TRANSFER INC
2777 WALDEN AVE
BUFFALO, NY 14225

Contact: JOHN BIGGIE
API AIRTECH
91 NORTH ST - PO BOX 68
ARCADE, NY 14009-0068
(585) 496-5755

Facility: API HEAT TRANSFER INC
91 NORTH ST
ARCADE, NY 14009

Description:

(1) API Heat Transfer (API) located at 91 North Street, Arcade, New York manufactures aluminum heat exchangers and aftercoolers. As part of the production process, API operates two Ultra-Kool batch, open-top solvent vapor cleaning machines.

(2) API has replaced the original cleaning solvent, trichloroethylene (TCE, CAS No. 79-01-6), with FluoSolv®CX, a solvent blend of trans-Dichloroethylene, hydrofluorocarbons and other fluorocarbons. FluoSolv®CX does not contain any solvent listed in 40CFR63.460, the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning (40 CFR 63, Subpart T). As such, API is no longer applicable to the Halogenated Solvent Cleaning NESHAP, as acknowledged by the USEPA in an applicability determination dated October 14, 2014.

(3) This permit action is being completed to change the permit type from a Title V permit to an Air State Facility permit. This can be completed because the facility is no longer subject to 40CFR63 Subpart T and emissions have been reduced below major source thresholds.

(4) API is limiting total facility-wide emissions of volatile organic compounds (VOC) to less than 50 tons per year (tpy) as determined by summing the individual monthly emissions during any consecutive 12 month period. By accepting these limitations on yearly VOC emissions, the facility avoids the requirements of Title V permitting.



(5) Each batch vapor solvent cleaning machine is required to satisfy the emission control requirements of 6NYCRR Part 226.

(6) Reduced room draft and freeboard refrigeration device monitoring have been added to ensure solvent emissions are reduced for compliance with 6NYCRR Part 201-6 and Part 212.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: DAVID S DENK
 DIVISION OF ENVIRONMENTAL PERMITS
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- 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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by 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: 9-5620-00040/02005

Facility DEC ID: 9562000040



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: API HEAT TRANSFER INC
2777 WALDEN AVE
BUFFALO, NY 14225

Facility: API HEAT TRANSFER INC
91 NORTH ST
ARCADE, NY 14009

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

Permit Effective Date: 06/09/2015

Permit Expiration Date: 06/08/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 2 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 4 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

EU=1-00000

- 5 6 NYCRR 212.4: Compliance Demonstration
- 6 6 NYCRR 212.4: Compliance Demonstration
- 7 6 NYCRR 212.4: Compliance Demonstration
- 8 6 NYCRR 212.4: Compliance Demonstration
- 9 6 NYCRR 212.4: Compliance Demonstration
- 10 6 NYCRR 212.4: Compliance Demonstration
- 11 6 NYCRR Part 226: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 12 ECL 19-0301: Contaminant List
- 13 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 14 6 NYCRR Subpart 201-5: Emission Unit Definition
- 15 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 16 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 17 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 18 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 19 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



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: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;
- (3) During the period of the emergency the facility owner and/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 and/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 and/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 F: 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 G: 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 H: 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 I: 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 J: 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 K: 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 L: 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 M: Federally Enforceable Requirements - 40 CFR 70.6 (b)

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Non Applicable requirements



Effective between the dates of 06/09/2015 and 06/08/2025

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

Item 1.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

40 CFR Part 63, Subpart T

Reason:

NON-APPLICABILITY TO 40CFR63, SUBPART T

API Heat Transfer (API) operates two Ultra-Kool batch, open-top solvent vapor cleaning machines. API has replaced the original cleaning solvent, trichloroethylene (TCE, CAS No. 79-01-6), with FluoSolv®CX, a solvent blend of trans-Dichloroethylene, hydrofluorocarbons and other fluorocarbons. FluoSolv®CX does not contain any solvent listed in 40CFR63.460, the Halogenated Solvent Cleaning NESHAP (40 CFR 63, Subpart T). As such, API is no longer applicable to the Halogenated Solvent Cleaning NESHAP, as acknowledged by the USEPA in an applicability determination dated October 14, 2014.

40 CFR 63.11514 (a)

Reason:

NON-APPLICABILITY TO 40CFR63, SUBPART XXXXXX

API Heat Transfer (API) is primarily engaged in one of the nine operations listed in 40 CFR 63, Subpart XXXXXX - NESHAP for Nine Metal Fabrication and Finishing Source Categories. This is based on the primary NAICS code for the facility being 332410. API operates machining and welding sources, however, the materials processed do not contain metal fabrication HAP in excess of the threshold concentrations. Therefore, there are no requirements applicable to the facility. Should API begin to use materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), then the facility will become subject to the NESHAP for Nine Metal Fabrication and Finishing Source Categories and proper compliance and notifications to the USEPA and NYSDEC must be completed.

Condition 2: Facility Permissible Emissions
Effective between the dates of 06/09/2015 and 06/08/2025



Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2.1:

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: 0NY998-00-0

PTE: 90,000 pounds per year

Name: VOC

Condition 3: Capping Monitoring Condition
Effective between the dates of 06/09/2015 and 06/08/2025

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):



CAS No: 0NY998-00-0 VOC

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 50 TPY VOC EMISSION LIMIT

(1) Total facility-wide emissions of volatile organic compounds (VOC) shall be limited to less than 50 tons per year (tpy) as determined by summing the individual monthly emissions during any consecutive 12 month period. By accepting these limitations on yearly VOC emissions, the facility avoids the requirements of Title V permitting.

(2) The following or similar information shall be maintained to demonstrate the emission calculations are verifiable and enforceable:

(a) a current list of all VOC containing or producing products in use throughout the facility. This list must include: information on the manufacturer, brand, product name or code, VOC content, or other manufacturer's product specifications, material content reports or laboratory analyses providing this information;

(b) a description of equipment used, including type, make and model; maximum design process rate or throughput; emission control unit information, as applicable;

(c) a monthly log of the purchase of each VOC product and calculations showing compliance with the emission limit. For the purpose of complying with this requirement, all VOC consumed by the processes are to be considered as being emitted into the atmosphere unless there is supporting documentation to verify a lesser amount;

(d) all purchase orders, invoices, and other documents to support information in the monthly log.

(3) The 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 this

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facility, 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.

(4) On an annual basis, 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 those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: VOC

Upper Permit Limit: 50 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 4: Air pollution prohibited
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 4.1:

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 5: Compliance Demonstration
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable Federal Requirement:6 NYCRR 212.4

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000



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

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

BASE DESIGN REQUIREMENTS

In addition to the design requirements specified in 6NYCRR Part 226, the batch vapor machines must be equipped with the following:

- (1) Either an idling mode cover or reduced room draft.
- (2) A freeboard ratio of 0.75 or greater.
- (3) Automated parts handling system which moves parts or parts baskets at a speed of 11 feet per minute or less.
- (4) Vapor cleaning machines shall be equipped with automatic shutoff if the sump liquid solvent level drops to the sump heater coils.
- (5) Vapor cleaning machines shall be equipped with automatic shutoff if the vapor level rises above the primary condenser.
- (6) Vapor machines shall have a primary condenser.
- (7) Cleaning machines with a lip exhaust shall use a carbon adsorber to control emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Compliance Demonstration
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable Federal Requirement: 6 NYCRR 212.4

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000



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

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

WORK AND OPERATIONAL PRACTICES

In addition to the operational requirements specified in 6NYCRR Part 226, the batch vapor machines shall meet each of the following work and operational practices:

- (1) Air disturbances across the cleaning machine shall be controlled by either using an idling mode cover or reduced room draft.
- (2) The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50% of the solvent/air interface area unless the parts are introduced at a speed of 3 feet per minute or less.
- (3) All spraying operations are to be done within the vapor zone.
- (4) Orient parts so that solvent drains freely from them. Parts with holes shall be tipped or rotated before being removed.
- (5) Parts or parts baskets are not to be removed until dripping has stopped.
- (6) During startup of vapor machines, the primary condenser shall be turned on before the sump heater.
- (7) During shutdown of vapor machines, the sump heater shall be turned off before the primary condenser.
- (8) Solvent shall be transferred to and from machines using leakproof couplings and submerged filling.
- (9) Equipment shall be operated per manufacturer's specifications.
- (10) Each operator shall be able to pass the applicable sections of the test of solvent cleaning operating procedures in Appendix A of this subpart.

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(11) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers.

(12) Sponges, fabric, wood and paper products are not to be cleaned.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable Federal Requirement:6 NYCRR 212.4

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

SOLVENT USAGE

The solvent usage for each cleaning machine shall be documented as follows:

(1) The dates and amounts of solvent that are added to each solvent cleaning machine.

(2) The solvent composition of wastes removed from each solvent cleaning machine.

(3) Calculation sheets showing how monthly emissions and the 12-month rolling total emissions from each solvent cleaning machine were determined, and the results of all calculations.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration
Effective between the dates of 06/09/2015 and 06/08/2025



Applicable Federal Requirement:6 NYCRR 212.4

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

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

Item 8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

REDUCED ROOM DRAFT

Reduced room draft is used to reduce uncaptured solvent emissions. API Heat Transfer shall achieved the reduced room draft by utilizing a partial enclosure and completing the following:

- (1) Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 50 feet per minute at any time.
- (2) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 50 feet per minute or less.
- (3) Conduct monthly monitoring tests of the windspeed within the enclosure using the following procedure:
 - (i) Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.
 - (ii) Record the maximum wind speed.
- (4) Complete and record the results of a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.

Parameter Monitored: AIR FLOW

Upper Permit Limit: 50 feet per minute

Monitoring Frequency: MONTHLY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 9: Compliance Demonstration
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable Federal Requirement: 6 NYCRR 212.4

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

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

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

CONVEYOR SPEED AND HOIST SPEED MONITORING

Each cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a horizontal conveyor speed and a vertical hoist speed of 11 feet per minute or less from the initial loading of parts through removal of cleaned parts. API Heat Transfer shall monitor the horizontal conveyor speed and the vertical hoist speed as follows:

- (1) Determine the horizontal conveyor speed and the vertical hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in feet divided by the time in minutes (feet per minute).
- (2) No exceedances of the conveyor or hoist speed were measured during the first year of operation. As such, API Heat Transfer may monitor the conveyor and hoist speeds QUARTERLY.
- (3) If an exceedance of the conveyor or hoist speed occurs during quarterly monitoring, the monitoring frequency returns to MONTHLY until another year of compliance without an exceedance is demonstrated.
- (4) An exceedance has occurred if the conveyor or hoist speed exceeds 11 feet per minute at any time.

Work Practice Type: PROCESS MATERIAL THRUPUT



Process Material: PARTS
Upper Permit Limit: 11 feet per minute
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

Condition 10: Compliance Demonstration
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable Federal Requirement: 6 NYCRR 212.4

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

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

Item 10.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

FREEBOARD REFRIGERATION DEVICE

A freeboard refrigeration device is used to control solvent emissions. API Heat Transfer shall:

- (1) Ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point. The boiling point of FluoSolv®CX is 111 °F.
- (2) Use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
- (3) An exceedance has occurred if the temperature at the center of the freeboard refrigeration device is above 33 °F and the problem is not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required operating limits. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.



Parameter Monitored: TEMPERATURE
Upper Permit Limit: 33 degrees Fahrenheit
Monitoring Frequency: WEEKLY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable Federal Requirement: 6 NYCRR Part 226

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

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

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

6NYCRR 226. Requirements for ConveyORIZED Degreasers
(For nonTitle V)

A. Equipment Specifications

The following types of control equipment must be used when
conducting conveyORIZED degreasing, solvent metal
cleaning:

(1) One of the following:
(i) a refrigerated chiller; or
(ii) local exhaust ventilation and a carbon adsorption
unit, or an equivalent system, for collection of VOCs.

(2) A drying tunnel, rotating basket or other device
acceptable to the Department which prevents carry-out of
VOCs.

(3) Safety switches which shut off the system when the
degreaser malfunctions.

(4) Minimize openings at the entrance and exit of the
degreaser.

B. Operating Requirements:

(1) Exhaust ventilation rate shall not exceed 125 percent
of the minimum ventilation rate required for the
protection of workers in the vicinity of the degreaser.



- (2) Minimize carry-out emissions by:
 - (i) proper racking for best drainage; and
 - (ii) maintaining a conveyor speed at less than 11 ft/min.
- (3) Water must not be visibly detectable in the solvent leaving the water separator.

C. General Requirements:

A Person conducting solvent metal cleaning must:

- (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
- (2) Maintain equipment to minimize leaks and fugitive emissions.
- (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
- (4) Keep the degreaser cover closed except when:
 - (a) parts are being placed into or being removed from the degreaser;
 - (b) adding or removing solvent from the degreaser;or
 - (c) no solvent is in the degreaser.
- (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
- (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.

Monitoring Frequency: AS REQUIRED - SEE PERMIT 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: 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 B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a 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 12: Contaminant List
Effective between the dates of 06/09/2015 and 06/08/2025



Applicable State Requirement:ECL 19-0301

Item 12.1:

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

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

Condition 13: Malfunctions and start-up/shutdown activities
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable State Requirement:6 NYCRR 201-1.4

Item 13.1:

(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 14: Emission Unit Definition
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 14.1:

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

Emission Unit: 1-00000

Emission Unit Description:

Emission Unit 1-00000 includes two Ultra-Kool batch, open-top solvent vapor cleaning machines. The cleaning machines use a non-chlorinated solvent, FluoSolv®CX, to remove lubricating oils from internal fins, header bars and face bars, which are components of the heat exchangers produced by the facility. The cleaning machines are equipped with covers and refrigerated condensers to control solvent vapor emissions. Solvent emissions are further reduced by the use of distillation units to recycle solvent. The cleaning machines are located within partial enclosures that extend above the tank. Air sweeps at the base of the enclosure capture heavier-than-air solvent vapors and duct them to a single emission point.

Building(s): 01

Item 14.2:

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

Emission Unit: 2-00000

Emission Unit Description:

Emission Unit 2-00000 includes two automated mig welding machines using ER4043 aluminum weld rod to attach manifolds and fittings to heat exchanger cores. Regulated contaminant emissions include PM-10 controlled using a Torit dust collector. The filtered air is discharged inside the building.

Building(s): 01

Condition 15: Renewal deadlines for state facility permits
Effective between the dates of 06/09/2015 and 06/08/2025

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

Item 15.1:

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 16: Compliance Demonstration
Effective between the dates of 06/09/2015 and 06/08/2025



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

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 17: Visible Emissions Limited
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable State Requirement:6 NYCRR 211.2

Item 17.1:

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 18: Emission Point Definition By Emission Unit
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1:

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

Emission Unit: 1-00000

Emission Point: 10000



Height (ft.): 38 Diameter (in.): 18
NYTMN (km.): 4715.443 NYTME (km.): 219.749 Building: 01

Item 18.2:

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

Emission Unit: 2-00000

Emission Point: 20000

Height (ft.): 15 Length (in.): 480 Width (in.): 360
NYTMN (km.): 4715.443 NYTME (km.): 219.749 Building: 01

Condition 19: Process Definition By Emission Unit
Effective between the dates of 06/09/2015 and 06/08/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1:

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

Emission Unit: 1-00000

Process: 101

Source Classification Code: 4-01-002-55

Process Description:

Process 101 includes two batch solvent vapor cleaning machines using FluoSolv®CX, a blend of trans-Dichloroethylene, hydrofluorocarbons and other fluorocarbons. Each cleaning machine is required to satisfy the emission control requirements of 6NYCRR Part 226. In addition, more detailed monitoring and controls are required to reduce solvent emissions for compliance with 6NYCRR Part 201-6 and Part 212. Each machine is equipped with a freeboard refrigeration device and is designed to maintain a freeboard ratio of 1.0. Each machine is located within a room configured to reduce drafts. Point and uncaptured solvent emissions from both machines operating simultaneously have been demonstrated to meet the short-term and annual guidance concentrations as outlined in 6NYCRR Part 212 and DAR-1.

Emission Source/Control: 1K000 - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: 2QT00 - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: 10000 - Process

Emission Source/Control: 20000 - Process
Design Capacity: 1,200 pounds per hour

Item 19.2:

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



Emission Unit: 2-00000

Process: 200

Source Classification Code: 3-09-052-00

Process Description:

Process 200 includes two automated mig welding machines that use ER4043 aluminum gas metal arc electrodes to attach the manifolds and fittings to the heat exchanger cores. The exhaust is sent through torit filters and discharged back into the building.

Emission Source/Control: 2K000 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 2A000 - Process

Emission Source/Control: 2B000 - Process

