



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 1-4720-01919/00001

Renewal Number: 2

12/11/2015

Facility Identification Data

Name: LAWRENCE RIPAK FACILITY

Address: 165 FIELD ST

WEST BABYLON, NY 11704-1416

Owner/Firm

Name: RIPAK AEROSPACE PROCESSING LLC

Address: 165 FIELD ST

WEST BABYLON, NY 11704, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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Air Permitting Contact:

Name: GALLI ENGINEERING PC

Address: 734 WALT WHITMAN RD STE 402A

MELVILLE, NY 11747

Phone:5162719292

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

The Lawrence Ripak facility performs nondestructive testing, surface finishing, and surface coating of aerospace parts. The facility consists of two buildings, the headquarters (building HDQ) located at 165 Field Street, and adjacent Plant 2 (building 155) at 155 Field Street.

High specification parts fabricated by others are tested (magnaflux, dye ultrasonic), treated (cadmium and



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copper plated, chromium and sulfuric acid anodized, vapor degreased), and/or painted by using compliant primers and top coats.

The facility is equipped with a paint shop consisting of nine spray booths, one drying oven, and exhausts from one mixing room and one storage room. The facility's painting operations are regulated under 6NYCRR Part 228 - Surface Coating Processes.

Lawrence Ripak is not subject to 40 CFR Part 63 Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities- since the facility is not a major source of hazardous air pollutants.

The facility conducts vapor degreasing of aerospace parts by using perchloroethylene as the working solvent in two vapor degreasers with solvent/air interface areas greater than 1.21 square meters located in a non-vented (no physical emission point), draft-free room. The vapor degreasing operations are regulated under 40 CFR Part 63 Subpart T - National Emission Standards for Halogenated Solvent Cleaning. To comply with Subpart T, the facility is using the control combination number 6, which requires a freeboard refrigeration device to chill the air immediately above the vapor zone, reduced room draft, and freeboard ratio of 1 to ensure that the perchloroethylene solvent on the parts vaporizes within the machine confines or drains back into the machine.

Lawrence Ripak uses a variety of cyanide based solutions and associated thermal treatments to conduct cadmium and copper plating of steel aerospace parts. The emissions from these processes are governed by 6NYCRR Part 212 - General Process Emission Sources.

The facility also conducts acid-based cleaning and uses chromic and sulfuric acids for its anodizing processes. Emissions from chromic acid anodizing are regulated under 40 CFR Part 63 Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. Chromium emissions are controlled by maintaining a surface tension in the Chrome Anodize tank (CANOD) of 45dynes/cm or less. The aqueous effluent streams from the baths are processed by ultrafiltration and reverse osmosis, and are returned to the process.

Attainment Status

LAWRENCE RIPAK FACILITY is located in the town of BABYLON in the county of SUFFOLK. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT



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* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NO_x) which are ozone precursors.

** NO_x has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

The Lawrence Ripak facility performs nondestructive testing, surface finishing, and surface coating of aerospace parts. The facility consists of two buildings, the headquarters (building HDQ) located at 165 Field Street, and adjacent Plant 2 (building 155) at 155 Field Street. High specification parts fabricated by others are tested (magnaflux, dye ultrasonic), treated (cadmium and copper plated, chromium and sulfuric acid anodized, vapor degreased), and/or painted by using compliant primers and top coats.

Permit Structure and Description of Operations

The Title V permit for LAWRENCE RIPAK FACILITY

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

LAWRENCE RIPAK FACILITY is defined by the following emission unit(s):

Emission unit 40ACID - Acid based cleaning and anodizing of aerospace parts.

Emission unit 40ACID is associated with the following emission points (EP):
00011, 00012, 00019

Process: AC1 is located at AREA II, Building HDQ - Alkaline cleaning of non-ferrous aerospace parts.

Process: AC2 is located at AREA II, Building HDQ - Acid pickling of aluminum aerospace parts.

Process: AC3 is located at AREA II, Building HDQ - Acid pickling of titanium parts.

Process: AC4 is located at AREA II, Building HDQ - Acid based nickel plating.

Process: AC5 is located at AREA II, Building HDQ - Sulfuric acid anodizing of aluminum aerospace parts.

Process: AC6 is located at AREA II, Building HDQ - Sealing of newly anodized aluminum aerospace



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parts.

Process: AC7 is located at AREA II, Building HDQ - Chromic acid anodizing of aluminum aerospace parts.

Process: AC8 is located at AREA II, Building HDQ - Boric-sulfuric anodizing of aluminum aerospace parts.

Process: AC9 is located at Area II, Building HDQ - Compliant coatings are applied to aerospace parts in seven spray booths. After air drying, most parts are dried in an oven.

Process: ACA is located at Area II, Building HDQ - Cadmium plating of steel aerospace parts using caustic cyanide solutions.

Emission unit 5PLNT2 - Acid based cleaning and sulfuric acid anodizing of aerospace parts.

Emission unit 5PLNT2 is associated with the following emission points (EP):

00101, 00103, 00104, 00105

Process: DC1 is located at AREA 2, Building 155 - Boric-sulfuric anodizing of aluminum aerospace parts.

Process: DC2 is located at AREA 2, Building 155 - Sealing of newly anodized aluminum aerospace parts.

Process: DC3 is located at AREA 2, Building 155 - Acid pickling of aluminum aerospace parts.

Process: DC4 is located at AREA 2, Building 155 - Alkaline cleaning of aerospace parts.

Process: DC5 is located at AREA 2, Building 155 - Alkaline cleaning of aerospace parts.

Process: DC6 is located at AREA 2, Building 155 - Alkaline cleaning of aerospace parts.

Process: DC7 is located at AREA 1, Building 155 - Cyanide, acid, and penetrant rinses and settling tanks. Waste streams from processes in buildings 155 and 165 are treated by ultrafiltration, metals precipitation, pH adjust, chrome reduction, and reverse osmosis. The process may be subject to hazardous



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waste regulation.

Process: DC8 is located at Shot Peen Area, Building 155 - Dust collecting to removed particulates from shot peening operations.

Emission unit 2000VD - Vapor degreasing operation.

Process: DEG is located at SHIPPING/RECEIVING, Building HDQ - Vapor degreasing of aerospace parts using perchloroethylene as working solvent. Emission unit consists of two vapor degreaser Vapor Engineering model vds-84c, located in a draft free room, non-vented (no physical emission point). The following controls are employed 1) freeboard chiller, 2) freeboard ratio (=1.0), 3) working mode cover, 4) parts rate of removal controlled at <8 fpm, 5) reduced room draft, 6) operator training and certification, 7) on delay timer for sump heaters, 8) off delay timer for freeboard chiller, 9) no lip exhaust.

Emission unit 1PAINT - Paint shop consisting of seven spray booths, two drying ovens and exhaust from one mixing/storage room. All coatings are compliant coatings.

Emission unit 1PAINT is associated with the following emission points (EP):

00001, 00002, 00003, 00004, 00005, 00006, 00007, 00016, 00017, 00018

Process: CC1 is located at PAINT SHOP, Building HDQ - Compliant coatings are applied to aerospace parts in seven spray booths after air drying. Most parts are dried in an oven.

Emission unit 3CADPL - Plating of steel aerospace parts using a variety of cyanide based solutions, and associated thermal treatment.

Emission unit 3CADPL is associated with the following emission points (EP):

00008, 00009, 00010, 00013

Process: CN1 is located at AREA III, Building HDQ - Cadmium plating of steel aerospace parts using caustic cyanide solutions with brightening agents added.

Process: CN2 is located at AREA III, Building HDQ - Cadmium plating of steel aerospace parts using caustic cyanide solutions containing titanium paste additive (pattented Boeing process).

Process: CN3 is located at AREA III, Building HDQ - Cadmium plating of steel aerospace parts using caustic cyanide solutions with brightening agents added.

Process: CN4 is located at AREA III, Building HDQ - Cadmium plating of steel aerospace parts using



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caustic cyanide solutions at high current densities.

prior of heat treating.

Process: CN6 is located at AREA III, Building HDQ - Copper stripping of steel aerospace parts after heat testing (no electric current).

Process: CN7 is located at AREA III, Building HDQ - Caustic alkaline cleaning of steel aerospace parts prior to either copper or cadmium plating.

Process: CN8 is located at AREA III, Building HDQ - Oven used for moderate temperature stress relief of plated steel parts.

Title V/Major Source Status

LAWRENCE RIPAK FACILITY is subject to Title V requirements. This determination is based on the following information:

The facility has chosen to be regulated under Title V as this level of regulation will allow for a possible change in facility classification from an area source to a major source of Hazardous Air Pollutants (HAPs). HAPs are emitted from the facility's spray coating, acid-based anodizing, and electroplating operations.

Program Applicability

The following chart summarizes the applicability of LAWRENCE RIPAK FACILITY with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO

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TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.



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SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis

of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

3471	ELECTROPLATING, POLISHING, ANODIZING, AND COLORING
3479	METAL COATING AND ALLIED SERVICES, NEC
8734	TESTING LABORATORIES

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code

Description

3-09-010-03	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - ELECTROPLATING OPERATIONS FABRICATED METALS-ELECTROPLATING-ENTIRE PROCESS-NICKEL
3-09-010-42	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - ELECTROPLATING OPERATIONS COPPER (CYANIDE, INCLUDING STRIKE) - ELECTROPLATING TANK
3-09-010-52	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - ELECTROPLATING OPERATIONS
3-09-010-97	CADMIUM (CYANIDE) - ELECTROPLATING TANK FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - ELECTROPLATING OPERATIONS
3-09-010-98	Other Not Classified FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - ELECTROPLATING OPERATIONS Other Not Classified

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3-09-011-01	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - CONVERSION COATING OF METAL PRODUCTS Alkaline Cleaning Bath
3-09-011-02	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - CONVERSION COATING OF METAL PRODUCTS Acid Cleaning Bath (Pickling)
3-09-011-03	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - CONVERSION COATING OF METAL PRODUCTS Anodizing Kettle
3-09-011-04	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - CONVERSION COATING OF METAL PRODUCTS Rinsing/Finishing
3-09-011-99	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - CONVERSION COATING OF METAL PRODUCTS Other Not Classified
4-01-002-53	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING PERCHLOROETHYLENE - GENERAL DEGREASING UNITS
4-02-025-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Coating Operation
4-02-025-02	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Cleaning/Pretreatment

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000108-10-1	2-PENTANONE, 4-METHYL	> 0	but < 10 tpy
007631-86-9	AMORPHOUS SILICA	> 0	but < 10 tpy



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001309-64-4	ANTIMONY TRIOXIDE	> 0 but < 10 tpy
007440-43-9	CADMIUM	> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	> 0 but < 2.5 tpy
013907-45-4	CHROMATE	> 0 but < 10 tpy
007738-94-5	CHROMIC ACID	> 0 but < 10 tpy
010588-01-9	CHROMIC ACID DISODIUM SALT	> 0 but < 10 tpy
007775-11-3	CHROMIC ACID, DISODIUM SALT	> 0 but < 10 tpy
007440-47-3	CHROMIUM	> 0 but < 10 tpy
018540-29-9	CHROMIUM (VI)	> 0 but < 10 tpy
000057-12-5	CYANIDE	> 0 but < 10 tpy
000111-15-9	ETHANOL, 2-ETHOXY-, ACETATE	> 0 but < 10 tpy
007664-39-3	HYDROGEN FLUORIDE	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE	> 0 but < 10 tpy
000101-68-8	METHYLENE BISPHENYL ISOCYANATE	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES	> 0 but < 2.5 tpy
000127-18-4	PERCHLOROETHYLENE	> 0 but < 10 tpy
0NY075-00-5	PM-10	> 0 but < 2.5 tpy
014808-60-7	QUARTZ	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	> 0 but < 2.5 tpy
007664-93-9	SULFURIC ACID	> 0 but < 2.5 tpy
0NY100-00-0	TOTAL HAP	>= 2.5 tpy but < 10 tpy
0NY998-00-0	VOC	> 0 but < 2.5 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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 B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section



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503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V 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.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as

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of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.



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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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description

FACILITY	ECL 19-0301	57	Powers and Duties of the Department with respect to air pollution control



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4-0ACID/-/AC7/CANOD	40CFR 63-N.340 (b)	49	Subpart N - Chromium Electroplating NESHAP
4-0ACID/-/AC7/CANOD	40CFR 63-N.342 (d) (2)	50	Subpart N - Standards
4-0ACID/-/AC7/CANOD	40CFR 63-N.342 (f)	51	Subpart N - Standards
4-0ACID/-/AC7/CANOD	40CFR 63-N.346 (a)	52	Subpart N - Recordkeeping requirements
4-0ACID/-/AC7/CANOD	40CFR 63-N.346 (b)	56	Subpart N - Recordkeeping requirements
4-0ACID/-/AC7/CANOD	40CFR 63-N.347 (a)	53	Subpart N - Reporting requirements
4-0ACID/-/AC7/CANOD	40CFR 63-N.347 (h)	54	Subpart N - Reporting requirements
4-0ACID/-/AC7/CANOD	40CFR 63-N.347 (h) (2)	55	Subpart N - Exceedance reporting requirements
2-000VD/-/DEG	40CFR 63-T.463 (a)	35, 36, 37, 38, 39	
2-000VD/-/DEG	40CFR 63-T.463 (b) (2) (i)	40	
2-000VD/-/DEG	40CFR 63-T.463 (d)	41	
2-000VD/-/DEG	40CFR 63-T.463 (e) (2) (i)	42	
2-000VD/-/DEG	40CFR 63-T.463 (e) (2) (ii)	43	
2-000VD/-/DEG	40CFR 63-T.463 (e) (2) (v)	44	
2-000VD/-/DEG	40CFR 63-T.467 (a)	45	Subpart T- Recordkeeping requirements
2-000VD/-/DEG	40CFR 63-T.467 (b)	46	Subpart T- Recordkeeping requirements
2-000VD/-/DEG	40CFR 63-T.468 (f)	47	Subpart T- Reporting requirements
2-000VD/-/DEG	40CFR 63-T.468 (i)	48	Subpart T- Reporting requirements
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
1-PAINT	6NYCRR 200.7	28	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	58	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	13	Trivial Activities - proof of eligibility



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FACILITY	6NYCRR 201-6	21, 26, 27	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	14	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	15	Fees
FACILITY	6NYCRR 201-6.5 (c)	3	General conditions
			Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	16	Compliance schedules
FACILITY	6NYCRR 201-6.5 (e)	22	Compliance Certification
FACILITY	6NYCRR 201-6.5 (f) (6)	17	Off Permit Changes
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	6	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	7	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	23	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	59	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212.4 (c)	24	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.9 (b)	25	General Process Emission Sources - tables
FACILITY	6NYCRR 215.2	8	Open Fires - Prohibitions
1-PAINT/-/CC1	6NYCRR 228-1.3 (a)	29	Recordkeeping, reports for VOCs
1-PAINT/-/CC1	6NYCRR 228-1.4	30	Opacity
1-PAINT/-/CC1	6NYCRR 228-1.5 (a)	31	VOC recordkeeping by the facility
1-PAINT/-/CC1	6NYCRR 228-1.8	32, 33, 34	Table 2

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without



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mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.5 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.



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6 NYCRR 201-6.5 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.5 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.5 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.5 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.5 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.5 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.5 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.



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6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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.

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, LAWRENCE RIPAK FACILITY has been determined to be subject to the following regulations:

40 CFR 63.340 (b)

This requires compliance with the general provisions which contains requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices .

40 CFR 63.342 (d) (2)

Surface tension of electroplating bath should be maintained at/below 45.0 dynes/centimeter

40 CFR 63.342 (f)

The owner/operator shall operate and maintain any affected source in a manner consistent with good air pollution control practices at all times. Malfunction should be corrected as soon as possible. The owner/operator shall keep the written O/M plan on record to be available for inspection upon request, by



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the administrator until the source is no longer subject to Subpart N.

40 CFR 63.346 (a)

The owner or operator of an affected sources to the provisions of Part 63 shall maintain files of all information required by Part 63 recorded in a form suitable and readily available for expeditious inspection and review. At least most recent 2 years of data shall be retained on site.

40 CFR 63.346 (b)

The owner/operator of the chromic acid bath shall maintain the necessary records pertaining to the chemical fume suppressant.

40 CFR 63.347 (a)

This requires fulfillment of all reporting requirements of Subpart N.

40 CFR 63.347 (h)

This requires the owner or operator of an affected source that is located at an area source site to submit an acceptable summary report to document the ongoing compliance status of the affected source.

40 CFR 63.347 (h) (2)

This condition describes the requirements for reporting excess emissions and malfunctions.

40 CFR 63.463 (a)

This reference is the heading for the existing and new in-line and batch vapor solvent cleaning machine design requirements (e.g., freeboard ratio, cover, minimize drafts) which are needed to minimize solvent loss.

40 CFR 63.463 (b) (2) (i)

This reference lists the seven control equipment options for batch vapor solvent cleaning machines with an opening greater than 13 square feet. However, other equivalent methods of control can be established.

40 CFR 63.463 (d)

This reference is the heading to all of the required work and operational practices that existing and new in-line and batch vapor solvent cleaning machines must meet.



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40 CFR 63.463 (e) (2) (i)

This reference provides the freeboard refrigeration device standards that must be met during each monitoring period.

40 CFR 63.463 (e) (2) (ii)

This reference provides the reduced room draft standards that must be met during each monitoring period. Also, the operating conditions which are used to meet the reduced room draft standard must be maintained continuously.

40 CFR 63.463 (e) (2) (v)

This reference provides the dwell requirements that must be met during each monitoring period.

40 CFR 63.467 (a)

This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for the lifetime of the machine.

40 CFR 63.467 (b)

This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for a period of five years.

40 CFR 63.468 (f)

This reference provides the annual report requirements for batch vapor and in-line solvent cleaning machines which are subject to this subdivision (i.e., complying with the provisions in section 63.463). Each annual report must be submitted by February 1.

40 CFR 63.468 (i)

This reference provides the conditions that must be met in order to change the exceedance reporting frequency from quarterly, or more frequent as determined by the EPA, back to semiannually.

6 NYCRR 211.1

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.



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6 NYCRR 212.4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.9 (b)

This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

6 NYCRR 228-1.3 (a)

This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

6 NYCRR 228-1.4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6 NYCRR 228-1.5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6 NYCRR 228-1.8

Table 2 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

Compliance Certification

Summary of monitoring activities at LAWRENCE RIPAK FACILITY:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
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4-0ACID/-/AC7/CANOD	51	record keeping/maintenance procedures
4-0ACID/-/AC7/CANOD	52	record keeping/maintenance procedures
4-0ACID/-/AC7/CANOD	56	record keeping/maintenance procedures
2-000VD/-/DEG	35	work practice involving specific operations
2-000VD/-/DEG	36	monitoring of process or control device parameters as surrogate
2-000VD/-/DEG	37	record keeping/maintenance procedures
2-000VD/-/DEG	38	monitoring of process or control device parameters as surrogate
2-000VD/-/DEG	39	record keeping/maintenance procedures
2-000VD/-/DEG	40	monitoring of process or control device parameters as surrogate
2-000VD/-/DEG	41	record keeping/maintenance procedures
2-000VD/-/DEG	42	monitoring of process or control device parameters as surrogate
2-000VD/-/DEG	43	monitoring of process or control device parameters as surrogate
2-000VD/-/DEG	44	record keeping/maintenance procedures
2-000VD/-/DEG	45	record keeping/maintenance procedures
2-000VD/-/DEG	46	record keeping/maintenance procedures
2-000VD/-/DEG	47	record keeping/maintenance procedures
1-PAINT	28	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	monitoring of process or control device parameters as surrogate
FACILITY	25	intermittent emission testing
1-PAINT/-/CC1	30	record keeping/maintenance procedures
1-PAINT/-/CC1	31	record keeping/maintenance procedures
1-PAINT/-/CC1	32	work practice involving specific operations
1-PAINT/-/CC1	33	work practice involving specific operations
1-PAINT/-/CC1	34	work practice involving specific operations

Basis for Monitoring

200.7: The facility is required to maintain the paint booths' emission control.

212.4(c): In lieu of stack testing, the facility is required to observe emissions on a daily basis in order to assure that there is no notable increase in PM emissions that may contravene the particulate emission limit of 0.050 grains per dscf.

212.9: The facility may, at the request of the Department, be required to perform stack testing to verify that sulfuric acid emissions are below the limit of 0.70 pounds per hour.

228-1.4: The facility is required to limit the opacity of emissions to 10%.

40 CFR 63, Subpart T: These regulations are concerned with HAP emissions. There are a number of monitoring requirements that are aimed at reducing these emissions.

40 CFR 63, Subpart N: These regulations are concerned with chromium emissions. There are a number of monitoring requirements that are aimed at reducing these emissions.



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