

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1442-00040/02003

Renewal Number: 1

06/15/2026

Facility Identification Data

Name: MOOG INC

Address: 400 JAMISON RD

ELMA, NY 14059-0018

Owner/Firm

Name: MOOG INC

Address: 400 JAMISON RD

PO BOX 18

EAST AURORA, NY 14052-0018, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: KRISTINE M CARLSON

Address: NYSDEC - REGION 9

700 DELAWARE AVE

BUFFALO, NY 14209

Phone:

Division of Air Resources:

Name: RYAN J ANELLO

Address: NYSDEC - Region 9

700 Delaware Ave

Buffalo, NY 14209-9519

Air Permitting Facility Owner Contact:

Name: JAKE STAPLES

Address: MOOG INC

5990 SENECA STREET

ELMA, NY 14059

Phone:7163680766

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

This permit is Air Title V (ATV) permit, renewal 1, for the continued operational activities at six neighboring complexes comprising the Facility. This ATV permit will replace the Facility's existing

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significant permit modification, renewal 0 modification 1, issued on January 29, 2018, and incorporates the following:

- 1) Increase existing volatile organic compound (VOC) Reasonably Available Control Technology (RACT) limit under 6 NYCRR Subpart 226-1 – Solvent Cleaning Processes for solvent spray hoods.
- 2) New VOC RACT analysis and limit under 6 NYCRR Subpart 226-2 – Industrial Cleaning Solvents for facility-wide solvent cleaning processes.
- 3) New VOC RACT analysis and limit 6 NYCRR Subpart 228-2 – Commercial and Industrial Adhesives, Sealants and Primers for facility-wide surface preparation solvent usage.
- 4) Addition and removal of various emission points and sources.

Attainment Status

MOOG INC is located in the town of ELMA in the county of ERIE.
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* | MARGINAL NON-ATTAINMENT |
| Oxides of Nitrogen (NOx)** | ATTAINMENT |
| Carbon Monoxide (CO) | ATTAINMENT |

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

The facility is a worldwide designer, manufacturer, and integrator of precision motion control products and systems. The facility consists of six neighboring complexes located at 160-500 Jamison Road, 611 Jamison Road, 721 Conley Road, 6860 Seneca Street, 7060 Seneca Street, and 7661 Seneca Street. This facility specializes in the design and manufacture of high-performance motion control systems for military and commercial aircraft, satellites and space and defense hardware, industrial machinery, energy industry machinery, marine applications, and medical equipment. Manufacturing at the facility is dependent on a highly specialized workforce working to individually assemble and test hardware. Technical design drawings and work instructions within each operation result in many stages of production sharing activities such as piece part soldering, applying adhesives, hand polishing, drilling, etc. These activities take place at specially designed stations performed by one or two people. Processes pertinent to air emissions permitting include soldering, solvent metal cleaning, various surface coating operations, paint stripping, and a wastewater evaporator.

Permit Structure and Description of Operations

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The Title V permit for MOOG INC

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.

MOOG INC is defined by the following emission unit(s):

Emission unit 000003 - This emission unit is comprised of the facility-wide volatile organic compounds (VOC) emissions which come from many small emission sources. Most of these emission sources by themselves could be exempted based on minor source exemption rules, 6 NYCRR Subpart 201-3.2.

This emission unit includes sources, such as non-destructive inspection or testing using liquid penetrants, custom solvent spray hoods, drying/curing of paints, adhesives, coatings, and forming/curing of cables, that also emit small amounts of HAPs as defined by 6 NYCRR Subpart 200.1.

VOC emissions resulting from paint booth operations are not included in this emission unit but are part of emission unit 0-00006.

Emission unit 000003 is associated with the following emission points (EP):

00008, 00015, 00017, 00018, 00022, 00028, 00029, 00041, 00046, 00076, 00080, 00095, 00099, 00100, 00111, 00113, 00115, 00128, 00139, 00152, 00153, 00154, 00157, 00160, 00161, 00162, 00167, 00168, 00171, 00243, 00244, 00428, 00476, 00496, 00524, 00532, 00533, 00534, 00535

Process: 003 The use of equipment facility-wide which generate VOC emissions, with the exception of three spray booths and one dip tank which are part of emission unit 0-00006.

Emission unit 000004 - Facility-wide soldering operation with many handheld soldering stations, wave soldering, and selective solder machines. A conservative 0.005 lb./lb. lead emission rate is used to calculate Lead Oxide emissions from this operation due to the widespread nature of the emission points and the fact that each emission point is made up of small equipment, sometimes handheld which are exempt emission sources per 6 NYCRR Subpart 201-3.3(c)(54).

Emission unit 000004 is associated with the following emission points (EP):

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00114, 00140, 00143

Process: 004 The use of facility-wide soldering equipment with many hand held soldering stations, wave soldering, and selective solder machines.

Emission unit 000005 - The facility operates a non-electrolytic metal coating operation consisting of a chromate conversion coating plating line that contains the metal HAP, chromium. There are two non-electrolysis plating tanks containing chromium, which are subject to the standards and management practices of 40 CFR 63 Subpart WWWW. Since the baths are operated at room temperature, there are no known emission factors found to quantify any potential emissions from this source. If there is no tank turbulence, it is reasonable to assume that there are no emissions (other than water vapor) because little or no volatile materials are in the process tanks.

Process: 005 The use of a non-electrolytic metal coating operation consisting of a chromate conversion coating plating line.

Emission unit 000006 - Paint booth operations with three (3) paint booths and one (1) dip tank. Each spray booth is fitted with a type of filter technology that is demonstrated to achieve at least a 98% capture of paint overspray and utilizes HVLP guns with at least 65% transfer efficiency. Surface coatings utilized by the facility need to meet military, aerospace, and/or government contractual requirements. The dip tank utilizes methylene chloride under a federal exemption for industrial or commercial use for paint and coating removal from safety-critical, corrosion-sensitive components of aircraft and spacecraft (40 CFR Part 751.109(a)(8)).

Emission unit 000006 is associated with the following emission points (EP):

00163, 00164, 00165, 00166

Process: 006 The use of three paint spray booths equipped with filters and HVLP guns, and one dip tank which uses methylene chloride.

Emission unit 000007 - This emission unit consists of a wastewater evaporator used mainly to evaporate wash waters since the facility is not serviced by a municipal sewer system. Spent aqueous parts washer solutions, which may contain detergents with small amounts of VOC, are also processed in the wastewater evaporator.

Emission unit 000007 is associated with the following emission points (EP):

00004

Process: 007 Operation of the wastewater evaporator.

Emission unit 000008 - The facility has a chemical cleaning operation which consists of numerous tanks for metal parts that use various strong acids, including hydrochloric acid, to remove surface imperfections such as embedded iron, oxides, heat tint stains, inorganic contaminants, rust, or scale. Hydrochloric acid is a HAP as defined by 6 NYCRR Subpart 200.1.

Emission unit 000008 is associated with the following emission points (EP):

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00064, 00068, 00069

Process: 008 Operation of the chemical cleaning process tanks using hazardous air pollutants (HAPs).

Emission unit 000002 - Facility-wide particulate matter (PM) & PM-10 emission sources with emissions calculated using the total amount of dust collected from all dust control equipment and cooling towers.

Sources include the following: electron beam welding machines, metal cutting, and laser engravers. These sources also emit small amounts of hazardous air pollutants (HAPs) as defined by 6 NYCRR Subpart 200.1.

PM emissions resulting from paint booth operations are not included in this emission unit but are part of emission unit 0-00006.

Emission unit 000002 is associated with the following emission points (EP):

00026, 00123, 00125, 00169, 00498

Process: 002 The use of equipment throughout the facility that generates particulate emissions.

Emission unit 000001 - Facility-wide combustion sources including emergency generators, boilers, furnaces, and stationary engines. All sources are exempt from permitting per various exemptions under 6 NYCRR Subpart 201-3.2(c)(1)-(7).

Non-delegated federal regulations apply to the emergency generators, which includes 40 CFR 60 Subpart III – New Source Performance Standards (NSPS): Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60 Subpart JJJJ – NSPS: Stationary Spark Ignition Internal Combustion Engines, and 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.

Process: 001 The use of natural gas and diesel as fuel for combustion sources (boilers, furnaces, generators) throughout the facility.

Title V/Major Source Status

MOOG INC is subject to Title V requirements. This determination is based on the following information: The annual potential to emit for volatile organic compounds (VOC) is greater than 50 tons per year.

Program Applicability

The following chart summarizes the applicability of MOOG INC with regards to the principal air pollution regulatory programs:

| Regulatory Program | Applicability |
|---------------------------|----------------------|
| PSD | NO |
| NSR (non-attainment) | NO |
| NESHAP (40 CFR Part 61) | YES |

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| | |
|--------------------------------|-----|
| NESHAP (MACT - 40 CFR Part 63) | YES |
| NSPS | YES |
| TITLE IV | NO |
| TITLE V | YES |
| TITLE VI | NO |
| RACT | YES |
| SIP | YES |

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52.21, 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 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 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

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term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

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

3492

FLUID POWER VALVES AND HOSE FITTINGS

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

1-03-006-03

EXTERNAL COMBUSTION BOILERS -
COMMERCIAL/INDUSTRIAL
COMMERCIAL/INSTITUTIONAL BOILER - NATURAL
GAS

3-09-001-98

Less Than 10 MMBtu/Hr
FABRICATED METAL PRODUCTS
FABRICATED METAL PRODUCTS - GENERAL
PROCESSES

3-09-001-99

Other Not Classified
FABRICATED METAL PRODUCTS
FABRICATED METAL PRODUCTS - GENERAL
PROCESSES

3-09-011-02

Other Not Classified
FABRICATED METAL PRODUCTS
FABRICATED METAL PRODUCTS - CONVERSION
COATING OF METAL PRODUCTS

3-09-011-99

Acid Cleaning Bath (Pickling)
FABRICATED METAL PRODUCTS
FABRICATED METAL PRODUCTS - CONVERSION
COATING OF METAL PRODUCTS

3-09-043-00

Other Not Classified
FABRICATED METAL PRODUCTS

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| | |
|-------------|--|
| 3-09-825-99 | FABRICATED METAL PRODUCTS - SOLDERING SOLDERING: GENERAL FABRICATED METAL PRODUCTS |
| 4-02-001-01 | FABRICATED METAL PRODUCTS - WASTEWATER, POINTS OF GENERATION WASTEWATER: SPECIFY POINT OF GENERATION SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Paint: Solvent-Base |

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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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 | PTE lbs/yr | PTE tons/yr | Actual lbs/yr | Actual tons/yr |
|-------------|---|------------|-------------|---------------|----------------|
| 000084-74-2 | 1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER | | | 0.1 | |
| 000107-21-1 | 1,2-ETHANEDIOL | | | 28.24 | |
| 000108-38-3 | 1,3 DIMETHYLBENZENE | | | 135.2 | |
| 000106-99-0 | 1,3-BUTADIENE | | | 2.33E-6 | |
| 000123-31-9 | 1,4-BENZENEDIOL | | | 0.000097 | |
| 000123-91-1 | 1,4-DIETHYLENE DIOXIDE | | | 0.53 | |
| 000109-86-4 | 2-METHOXYETHANOL | | | 0.233 | |
| 000108-10-1 | 2-PENTANONE, 4-METHYL | | | 2.3 | |
| 000079-10-7 | 2-PROPENOIC ACID | | | 5.18 | |
| 000140-88-5 | 2-PROPENOIC ACID, ETHYLESTER | | | 55.97 | |
| 001309-64-4 | ANTIMONY TRIOXIDE | | | 6.05 | |
| 007440-38-2 | ARSENIC | | | 0.000026 | |
| 000071-43-2 | BENZENE | | | 0.2 | |
| 000098-82-8 | BENZENE, (1- | | | 0.21 | |

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|-------------|---|--------|----------|------|
| 026471-62-5 | METHYLETHYL) BENZENE, 1,3- DIISOCYANATO | | 0.35 | |
| 026447-40-5 | METHYL BENZENE,1,1 MEYHYLENEBIS | | 4.1 | |
| 000100-44-7 | ISOCYANATO- BENZYL CHLORIDE | | 0.5 | |
| 007440-43-9 | CADMIUM | | 0.000026 | |
| 000124-38-9 | CARBON DIOXIDE | 6021.4 | | 2618 |
| 000630-08-0 | CARBON MONOXIDE | 4.27 | | 1.86 |
| 000108-90-7 | CHLOROBENZEN E | | 0.56 | |
| 010588-01-9 | CHROMIC ACID DISODIUM SALT | | 0.551 | |
| 007778-50-9 | CHROMIC ACID, DIPOTASSIUM SALT | | 0.22 | |
| 007440-47-3 | CHROMIUM | | 0.001 | |
| 007788-97-8 | CHROMIUM (III) FLUORIDE | | 0.033 | |
| 001333-82-0 | CHROMIUM OXIDE | | 30.5 | |
| 018540-29-9 | CHROMIUM(VI) | 133.56 | 58.07 | |
| 061789-51-3 | COBALT NAPHTHA | | 0.006 | |
| 000075-09-2 | DICHLOROMETH ANE | | 280 | |
| 000111-96-6 | ETHANE,1,1'- OXYBIS[- METHOXY] | | 16.3 | |
| 000111-90-0 | ETHANOL, 2- (2- ETHOXYETHOXY) | | 53.7 | |
| 000111-42-2 | ETHANOL, 2,2'- IMINOBI- | | 314.9 | |
| 000111-76-2 | ETHANOL, 2- BUTOXY- | | 399.2 | |
| 000112-15-2 | ETHANOL,2-(2- BUTOXYETHOXY)-3ACETATE | | 14.5 | |
| 000100-41-4 | ETHYLBENZENE | | 60.7 | |
| 000110-71-4 | ETHYLENE GLYCOL DIMETHYL ETHER | | 1.85 | |
| 000075-21-8 | ETHYLENE OXIDE | | 0.6 | |
| 000050-00-0 | FORMALDEHYDE | | 0.04 | |
| 000110-54-3 | HEXANE | | 131.5 | |
| 000822-06-0 | HEXANE, 1,6- DIISOCYANATO- | | 0.082 | |
| 007647-01-0 | HYDROGEN CHLORIDE | | 224.8 | |
| 007664-39-3 | HYDROGEN FLUORIDE | | 0.7 | |
| 007439-92-1 | LEAD | 7.406 | 3.22 | |
| 013423-61-5 | MAGNESIUM CHROMATE | | 3.09 | |
| 007439-96-5 | MANGANESE | | 0.042 | |
| 001313-13-9 | MANGANESE | | 152.7 | |

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|-------------|--|--------|----------|-------|
| 000067-56-1 | OXIDE METHYL ALCOHOL | | 39.6 | |
| 000101-68-8 | METHYLENE BISPHENYL ISOCYANATE | | 2533.71 | |
| 000091-20-3 | NAPHTHALENE | | 27.2 | |
| 007440-02-0 | NICKEL METAL AND INSOLUBLE COMPOUNDS | | 0.000026 | |
| 0NY210-00-0 | OXIDES OF NITROGEN | 5.324 | | 2.315 |
| 000106-89-8 | OXIRANE, (CHLOROMETHY L) | | 0.01 | |
| 0NY075-00-0 | PARTICULATES | 1.804 | | 0.784 |
| 000108-95-2 | PHENOL | | 49.7 | |
| 0NY075-00-5 | PM-10 | 1.804 | | 0.784 |
| 000075-56-9 | PROPANE, 1,2- EPOXY- QUINONE | | 0.5 | |
| 000106-51-4 | SULFUR DIOXIDE | 0.051 | 0.9 | 0.022 |
| 007446-09-5 | SULFURIC ACID, MANGANESE(2+) SALT (1:1) MONOHYDRATE | | 7.2 | |
| 000108-88-3 | TOLUENE | | 134.6 | |
| 0NY100-00-0 | TOTAL HAP | 2.392 | | 1.04 |
| 0NY998-00-0 | VOC | 126.85 | | 29.49 |
| 001330-20-7 | XYLENE, M, O & P MIXT. | | 24.1 | |
| 000106-42-3 | XYLENE, PARA- | | 41.6 | |
| 001314-13-2 | ZINC OXIDE (FUME) | | 0.9 | |

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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 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 B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(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 C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(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

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on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(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 E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(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 F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(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 G: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item H: Severability - 6 NYCRR Part 201-6.4(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 I: Permit Shield - 6 NYCRR Part 201-6.4(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 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;

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- 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 J: Reopening for Cause - 6 NYCRR Part 201-6.4(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.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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Item L: 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: Emergency Defense - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

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

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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 | 56 | Powers and Duties of the Department with respect to air pollution control |
| 0-00001 | 40CFR 60-IIIII | 42 | Standards of Performance for Stationary Compression Ignition Internal Combustion Engines |
| 0-00001 | 40CFR 60-JJJJ | 43 | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines |
| 0-00006 | 40CFR 63- HHHHHH.11173 (a) | 51 | NESHAP for Paint Stripping and Misc. Surface Coating - Paint Stripping |
| 0-00006 | 40CFR 63- HHHHHH.11173 (c) | 52 | General Requirements NESHAP for Paint Stripping and Misc. Surface Coating - Paint Stripping |
| 0-00006 | 40CFR 63-HHHHHH.11177 | 53 | General Requirements NESHAP for Paint Stripping and Misc. Metal Coating - Recordkeeping |
| 0-00006 | 40CFR 63-HHHHHH.11178 | 54 | General Requirements NESHAP for Paint Stripping and Misc. Metal Coating - Recordkeeping |
| 0-00005 | 40CFR 63- WWWWW.11507 (e) | 48 | Dry Mechanical Polishing Filter Requirements |
| 0-00005 | 40CFR 63- WWWWW.11507 (g) | 49 | Plating and Polishing Requirements |
| 0-00001 | 40CFR 63-ZZZZ | 44 | Reciprocating Internal Combustion Engine (RICE) NESHAP |
| FACILITY | 40CFR 68 | 17 | Chemical accident prevention provisions |
| FACILITY | 40CFR 82-F | 18 | Protection of Stratospheric Ozone - recycling and emissions reduction |

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| | | | |
|----------|-----------------------------|------------|--|
| FACILITY | 6NYCRR 200.6 | 1 | Acceptable ambient air quality. |
| FACILITY | 6NYCRR 200.7 | 9 | Maintenance of equipment. |
| FACILITY | 6NYCRR 201-1.4 | 57 | 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 |
| FACILITY | 6NYCRR 201-6 | 19, 40, 41 | Title V Permits and the Associated Permit Conditions |
| FACILITY | 6NYCRR 201-6.4 (a) (4) | 14 | General Conditions - Requirement to Provide Information |
| FACILITY | 6NYCRR 201-6.4 (a) (7) | 2 | General Conditions - Fees |
| FACILITY | 6NYCRR 201-6.4 (a) (8) | 15 | General Conditions - Right to Inspect |
| FACILITY | 6NYCRR 201-6.4 (c) | 3 | Recordkeeping and Reporting of Compliance Monitoring Records of Monitoring, Sampling and Measurement |
| FACILITY | 6NYCRR 201-6.4 (c) (2) | 4 | Reporting Requirements - Deviations and Noncompliance |
| FACILITY | 6NYCRR 201-6.4 (c) (3) (ii) | 5 | Compliance Schedules - Progress Reports |
| FACILITY | 6NYCRR 201-6.4 (d) (4) | 20 | Compliance Certification |
| FACILITY | 6NYCRR 201-6.4 (e) | 6 | Operational Flexibility |
| FACILITY | 6NYCRR 201-6.4 (f) | 21 | Required emissions tests. |
| FACILITY | 6NYCRR 202-1.1 | 16 | Emission statement methods and procedures |
| FACILITY | 6NYCRR 202-2.4 (a) (3) | 22 | Emission Statements - record keeping requirements. |
| FACILITY | 6NYCRR 202-2.5 | 7 | General Prohibitions - visible emissions limited. |
| FACILITY | 6NYCRR 211.2 | 23 | Limiting of Opacity |
| FACILITY | 6NYCRR 212-1.6 (a) | 24 | Federal SIP Criteria |
| FACILITY | 6NYCRR 212-2.3 (a) | 55 | air contaminants applicable to Table 3 |
| FACILITY | 6NYCRR 212-2.4 (b) | 25 | Control of Particulate from New and Modified Process Emission Sources |
| FACILITY | 6NYCRR 215.2 | 8 | Open Fires - Prohibitions |
| FACILITY | 6NYCRR 226-1.3 | 26 | General Requirements |

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| FACILITY | 6NYCRR 226-1.4 (a) | 27 | Cold cleaning controls (internal volume greater than two gallons) |
| FACILITY | 6NYCRR 226-1.5 (a) | 28 | Cold cleaning degreasing |
| 0-00003 | 6NYCRR 226-1.6 | 45 | Reasonably available control technology demonstrations |
| FACILITY | 6NYCRR 226-2.3 | 29 | Control Requirements |
| 0-00003 | 6NYCRR 226-2.4 (a) | 46 | RACT variance |
| FACILITY | 6NYCRR 228-1.3 (a) | 30 | Surface Coating |
| | | | General Requirements- Opacity |
| FACILITY | 6NYCRR 228-1.3 (b) (1) | 31 | General Requirements - Record Keeping |
| FACILITY | 6NYCRR 228-1.3 (c) | 32 | Surface Coating |
| | | | General Requirements- Prohibitions |
| FACILITY | 6NYCRR 228-1.3 (d) | 33 | Surface Coating |
| | | | General Requirements- Handling, storage and disposal |
| FACILITY | 6NYCRR 228-1.3 (e) | 34 | Surface Coating - General control requirements (Class A & most B) |
| FACILITY | 6NYCRR 228-1.3 (e) (2) | 35 | Use of 55 gallons of non-compliant coating |
| FACILITY | 6NYCRR 228-1.4 (b) (4) (ii) | 36 | Misc. metal parts coatingsVOC content limits |
| FACILITY | 6NYCRR 228-1.4 (e) (2) | 37, 38 | VOC limits for tablet, glass, leather, aerospace, urethane |
| 0-00006 | 6NYCRR 228-1.5 (e) | 50 | Process specific RACT demonstrations |
| FACILITY | 6NYCRR 228-2.4 (b) (1) | 39 | Surface Preparation |
| 0-00003 | 6NYCRR 228-2.4 (e) | 47 | Solvent |
| | | | Process-specific RACT demonstrations |

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 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

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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 201-6.4 (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.

6 NYCRR 201-6.4 (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 201-6.4 (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

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monitoring, as necessary.

6 NYCRR 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (d) (4)

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 201-6.4 (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 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.

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

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This Part lists the regulated substances and their 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, MOOG INC has been determined to be subject to the following regulations:

40 CFR 63.11173 (a)

This condition specifies that each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of methylene chloride (MeCl).

40 CFR 63.11173 (c)

This condition requires each paint stripping operation to maintain copies of annual usage of paint strippers containing methylene chloride (MeCl) on site at all times.

40 CFR 63.11177

This condition requires the owner or operator of a surface coating operation or a paint stripping operation to keep the records specified in paragraphs (a) through (g) of 40 CFR 63.11177, as applicable.

40 CFR 63.11178

This condition requires the owner or operator of an affected source to maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

40 CFR 63.11507 (e)

Requirements for dry mechanical polishing using cartridge, fabric, or high efficiency particulate air filters.

40 CFR 63.11507 (g)

Requirements for plating and polishing process units.

40 CFR Part 60, Subpart IIII

Subpart IIII applies to new and reconstructed compression ignition reciprocating internal combustion engines. Sources subject to Subpart IIII must comply with emission standards for hydrocarbons, nitrogen

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oxides, carbon monoxide, and particulate matter.

40 CFR Part 60, Subpart JJJJ

Subpart JJJJ applies to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in §60.4230, paragraphs (a)(1) through (6). Sources subject to Subpart JJJJ must comply with emission standards for nitrogen oxides, carbon monoxide, and volatile organic compounds.

40 CFR Part 63, Subpart ZZZZ

Subpart ZZZZ applies to reciprocating internal combustion engines. Sources subject to Subpart ZZZZ must limit emissions of carbon monoxide and formaldehyde. Sources must also comply with work practice standards and operating limits.

6 NYCRR 201-6.4 (f)

This citation outlines operational flexibility, which can allow a facility to make operational changes without making a permit modification if certain conditions are met.

6 NYCRR 202-2.4 (a) (3)

This citation outlines due dates for required emissions statements depending on the quantity of processes located at a facility.

6 NYCRR 212-1.6 (a)

This provision requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.3 (a)

Table 3 of 212-2.3 describes the reduction in emissions required for a criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of control applied.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 226-1.3

This section lists the general requirements for owners or operators conducting solvent cleaning processes.

6 NYCRR 226-1.4 (a)

This section describes the equipment specifications and control requirements for cold cleaners.

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6 NYCRR 226-1.5 (a)

This subpart describes the operating practices required by an owner or operator conducting solvent cleaning.

6 NYCRR 226-1.6

This section outlines reasonably available control technology for this Subpart.

6 NYCRR 226-2.3

This subpart outlines the control requirements for cleaning with industrial cleaning solvents containing VOC.

6 NYCRR 226-2.4 (a)

This section describes reasonably available control technology for compliance with this Subpart.

6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources subject to Subpart 228-1 from allowing emissions to the outdoor atmosphere, which reduces the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b) (1)

This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Subpart 228-1.

6 NYCRR 228-1.3 (c)

This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.3 (e)

This regulation outlines the general control requirements for emissions of volatile organic compounds related to surface coating.

6 NYCRR 228-1.3 (e) (2)

This citation allows any facility to use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits required by the regulation.

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6 NYCRR 228-1.4 (b) (4) (ii)

A facility applying miscellaneous metal parts coatings and using compliant coatings as a compliance technique may not use coatings with VOC contents, as applied, which exceed the limits specified in table B4.

6 NYCRR 228-1.4 (e) (2)

A facility applying aerospace coatings and using compliant coatings as a compliance technique may not use coatings with VOC contents, as applied, which exceed the limits specified in table E.

6 NYCRR 228-1.5 (e)

This citation specifies the required elements of a request to the Department, which may allow a specific coating process to use a degree of emission control less stringent than specified by the regulation.

6 NYCRR 228-2.4 (b) (1)

This regulation requires that the volatile organic compound content of a surface preparation solvent be less than 70 grams per liter.

6 NYCRR 228-2.4 (e)

The department may allow industrial adhesive application processes to operate with a lesser degree of control than is required by subdivisions (a), (b) and (c) of this section, provided the applicant makes a process specific reasonably available control technology (RACT) demonstration to the satisfaction of the department.

Compliance Certification

Summary of monitoring activities at MOOG INC:

| Location | Cond No. | Type of Monitoring |
|----------------------------------|-----------------|---|
| Facility/EU/EP/Process/ES | | |
| ----- | | |
| --- | | |
| 0-00001 | 42 | record keeping/maintenance procedures |
| 0-00001 | 43 | record keeping/maintenance procedures |
| 0-00006 | 51 | record keeping/maintenance procedures |
| 0-00006 | 52 | record keeping/maintenance procedures |
| 0-00006 | 53 | record keeping/maintenance procedures |
| 0-00006 | 54 | record keeping/maintenance procedures |
| 0-00005 | 48 | record keeping/maintenance procedures |
| 0-00005 | 49 | record keeping/maintenance procedures |
| 0-00001 | 44 | record keeping/maintenance procedures |
| FACILITY | 4 | record keeping/maintenance procedures |
| FACILITY | 5 | record keeping/maintenance procedures |
| FACILITY | 6 | record keeping/maintenance procedures |
| FACILITY | 24 | monitoring of process or control device parameters as surrogate |
| 0-00007 | 55 | record keeping/maintenance procedures |

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| | | |
|----------|----|---|
| FACILITY | 25 | intermittent emission testing |
| FACILITY | 26 | record keeping/maintenance procedures |
| FACILITY | 27 | work practice involving specific operations |
| FACILITY | 28 | work practice involving specific operations |
| 0-00003 | 45 | monitoring of process or control device parameters as surrogate |
| FACILITY | 29 | work practice involving specific operations |
| 0-00003 | 46 | monitoring of process or control device parameters as surrogate |
| FACILITY | 30 | monitoring of process or control device parameters as surrogate |
| FACILITY | 31 | record keeping/maintenance procedures |
| FACILITY | 33 | record keeping/maintenance procedures |
| FACILITY | 35 | work practice involving specific operations |
| FACILITY | 36 | work practice involving specific operations |
| FACILITY | 37 | work practice involving specific operations |
| FACILITY | 38 | work practice involving specific operations |
| 0-00006 | 50 | monitoring of process or control device parameters as surrogate |
| FACILITY | 39 | work practice involving specific operations |
| 0-00003 | 47 | monitoring of process or control device parameters as surrogate |

Basis for Monitoring

Most monitoring requirements contained in this permit are based on specific monitoring methods and observations as prescribed in the applicable rules. Facility specific monitoring conditions were written to assure that reliable information is obtained representing the facility's compliance status for all four (4) process specific VOC RACT determinations [permit conditions 45-47, and 50].

Mandatory Requirements (Conditions No. 1-23, 40-41, 56-57)

These monitoring conditions appear in all Air Title V permits.

Process Emission Sources: Particulate Emissions & Opacity Standards (Conditions No. 24, 25, and 55)

These conditions limit particulate emissions and opacity levels from emission sources subject to 6 NYCRR Part 212 – Process Operations, specifically the wastewater evaporator.

Cold Cleaning Degreasing General, Equipment, and Operational Requirements (Conditions No. 26-28)

These conditions list the general, equipment, and operational requirements for cold cleaning degreasers.

Industrial Cleaning Solvents Control Requirements (Condition No. 29)

This condition provides the control requirements for cleaning with industrial cleaning solvents containing VOC.

Surface Coating Processes: General Requirements (Condition No. 30-35)

These conditions set forth requirements for opacity standards, proper work practices, and recordkeeping requirements as it pertains to the surface coating processes.

Surface Coating Processes: VOC Content Limits (Condition No. 36-38)

These conditions set forth the VOC content limit requirements for coating lines operated at the facility per 6 NYCRR Subpart 228-1.4.

Condition 36 set forth the VOC content limit requirement for Class B, miscellaneous metal parts, coatings. Surface coatings at the facility applied to miscellaneous metal parts are categorized under military

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specification and shall meet the applicable VOC content limit per 6 NYCRR Subpart 228-1.4(b)(4), Table B4.

Condition 37 and 38 set forth the VOC content limit requirements for Class E, aerospace, coatings. Surface coatings at the facility applied to aerospace components are categorized as primers and topcoats and shall meet the applicable VOC content limits per 6 NYCRR Subpart 228-1.4(e), Table E.

Commercial and Industrial Adhesives, Sealant, and Primers: Surface Preparation Solvent (Condition No. 39)

This condition provides the VOC content limit for surface preparation solvents.

Emergency Generators (Condition No. 42-44)

These conditions state that the facility's emergency generators are subject to 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Internal Combustion Engines, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, and 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines and specifies how the generators are to comply with the rules.

Cold Cleaning Degreasing Process Specific VOC Reasonably Available Control Technology (RACT) Variance (Condition No. 45)

This condition describes the process specific VOC RACT variance per 6 NYCRR Subpart 226-1.6 which allows the use of isopropyl alcohol (IPA) within custom spray hoods for the purpose of solvent metal cleaning of certain parts as required in the manufacturing and rework of high precision metal parts. Contamination must be minimized in this process in accordance with a customer or other specification, so the use of IPA is required because it does not leave a residue. Under this approval, the facility shall limit annual VOC emissions from the usage of IPA within customized solvent spray hoods to less than 68,000 pounds/year (34 tons/year) and keep appropriate documentation.

Industrial Cleaning Solvent Process Specific VOC RACT Variance (Condition No. 46)

This condition describes the process specific VOC RACT variance per 6 NYCRR Subpart 226-2.4, which allows the use of IPA and heavy-duty rosin flux remover for solvent cleaning of specified work surfaces and equipment/parts, electronic printed circuit board (PCB) assembly, and production or aftermarket parts. IPA is contractually required for manual cleaning in the facility's electronics assembly processes as it does not leave a residue and dissolves a wide range of polar and non-polar soils. The heavy-duty rosin flux remover is only utilized on electronic PCBs that are required to be hand soldered and to remove flux from various pieces of equipment. The flux remover is designed to be especially effective on the rugged, high-temperature solders used on PCBs that the facility builds for the military and other government agencies. The limit contained within this condition is a combined facility limit for VOC RACT demonstrations required under 6 NYCRR Subpart 226-2.4(a) and Subpart 228-2.4(e). A combined facility limit was granted due to these processes occurring at individual workbench stations causing difficulty in tracking them separately. Under this approval, the Facility shall limit annual VOC emissions from the usage of IPA, heavy-duty rosin flux remover, and methyl propyl ketone (MPK) as an industrial cleaning solvent and/or surface preparation solvent to less than 185,800 pounds per year (92.9 tons per year) and keep appropriate documentation. Processes subject to 6 NYCRR Subpart 226-2.4(a) contribute approximately 79% (73.3 tons/year) of VOC emissions to the combined annual facility-wide limit.

Surface Preparation Solvent Process Specific VOC RACT Variance (Condition 47)

This condition describes the process specific VOC RACT variances per 6 NYCRR Subpart 228-2.4(e) which allows the use of IPA and methyl propyl ketone (MPK) as surface preparation solvents prior to the application of chemical adhesives and/or sealants. The facility utilizes IPA as a surface preparation solvent based off manufacturer procedures, studies, and the facility's self-testing for its manufacturing processes to

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meet stringent customer specifications regarding adhesive bond strength. MPK is used surface preparation solvent to provide increased sealant adhesion in the manufacturing of certain aircraft parts to meet customer specifications to prevent critical part failures. These surface preparation solvents are utilized on critical hardware in aircraft, space, and defense applications, where it is crucial to provide adequate bond strength to prevent failure of equipment/hardware. Contamination must be minimized in this process in accordance with a customer or other specification, so the use of IPA is required because it does not leave a residue. The limit contained within this condition is a combined facility limit for VOC RACT demonstrations required under 6 NYCRR Subpart 226-2.4(a) and Subpart 228-2.4(e). A combined facility limit was granted due to these processes occurring at individual workbench stations causing difficulty in tracking them separately. Under this approval, the facility shall limit annual VOC emissions from the usage of IPA, heavy-duty rosin flux remover, and methyl propyl ketone (MPK) as an industrial cleaning solvent and/or surface preparation solvent to less than 185,800 pounds per year (92.9 tons per year) and keep appropriate documentation. Processes subject to 6 NYCRR Subpart 228-2.4(e) contribute approximately 21% (19.6 tons/year) of VOC emissions to the combined annual facility-wide limit.

Area Source Applicability (Condition No. 48-49 and 51-54)

These conditions set forth the requirements for establishing and maintaining a facility as an area source for purposes of 40 CFR 63 Subpart WWWW – NESHAP: Area Source Standards for Plating & Polishing Operations, and Subpart HHHHHH – NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

Surface Coating Process Specific VOC RACT Variance (Condition No. 50)

This condition describes the process specific VOC RACT per 6 NYCRR Subpart 228-1.5(e) which allows the facility to use specific surface coating products that exceed the VOC content limits of Subpart 228-1 within the Class B and E coating lines. The surface coatings that do not meet the required VOC content limits are coatings that must meet military, aerospace, and/or government contractual requirements. The facility is required to maintain documentation of the reason(s) why compliant coatings were not used, and records documenting the total annual emissions of VOC from non-compliant coatings used/purchased within these emission sources on a 12-month total, rolled monthly basis. Under this approval, the facility shall limit VOC emissions from the usage of non-compliant coatings for the purposes described above to less than 6,000 pounds per year (3 tons/year) on a 12-month total, rolled monthly basis.