

Facility DEC ID: 4012200322

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 4-0122-00322/00006
Effective Date: 09/01/2023 Expiration Date: 08/31/2033

Permit Issued To: Marmen Energy Co
1820 N Plum Ave
Brandon, SD 57005

Contact: Pierre-David Paquette
Marmen Energy Co
1820 N Plum Ave
Brandon, SD 57005

Facility: Marmen-Welcon Tower Manufacturing Facility
309 River Rd - Beacon Island
Bethlehem, NY 12077

Description:
Facility for a new offshore wind tower manufacturing facility located at the Port of Albany, Albany County, NY. Facility also includes various combustion sources (boilers, space heaters, and generators) which are exempt due to size.

The facility had analysis performed as required by 6 NYCRR 212 and CLCPA.

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

Permit Administrator: KAREN M GAIDASZ
NYSDEC - HEADQUARTERS
625 BROADWAY
ALBANY, NY 12233-1750

Authorized Signature:  Date: 08 / 31 / 2023

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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- 5 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 5 5 Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS

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DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:
 The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
 The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
 A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:
 Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:
 The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
 The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3
 Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department

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Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 4 Headquarters
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014
(518) 357-2069

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: Marmen Energy Co
1820 N Plum Ave
Brandon, SD 57005

Facility: Marmen-Welcon Tower Manufacturing Facility
309 River Rd - Beacon Island
Bethlehem, NY 12077

Authorized Activity By Standard Industrial Classification Code:
3441 - FABRICATED STRUCTURAL METAL

Permit Effective Date: 09/01/2023

Permit Expiration Date: 08/31/2033

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EU=U-BOOTH

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FEDERALLY ENFORCEABLE CONDITIONS

FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

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Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

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

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit

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that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305

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

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)

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

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emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Visible Emissions Limited
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement:6 NYCRR 211.2

Item 1.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 2: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement:6 NYCRR 212-1.3

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):	
CAS No: 007440-02-0	NICKEL METAL AND INSOLUBLE
COMPOUNDS	
CAS No: 007440-43-9	CADMIUM
CAS No: 007439-96-5	MANGANESE

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Process source emissions were evaluated on an individual contaminant basis and each contaminant was assigned an environmental rating, with the exception of High Toxic Air Contaminants (HTACs) meeting the emission limits of Table 2 of 212-2.2 and non-HTACs emitted at a facility-wide annual rate of less than 100 pounds.

The first factor affecting a process emission source contaminant’s environmental rating (ER) is the toxicity classification (H-high, M-medium, or L-low) as defined in

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Part 212-1.2 and listed in the DAR-1 AGC/SGC tables. The DAR-1 environmental rating process commences with initially assigning the toxicity classification as the ER (H, M, L toxicity contaminants should be assigned an ER of “A”, “B” and “C,” respectively).

Based on the Potentials to Emit (PTE), emission rate potentials (ERP) and other supporting documentation associated with application ID. No. 4-0122-00322/00006, predicted maximum ambient impacts for the permitted contaminants are in compliance with SGCs/AGCs. In accordance with §212-1.3 - Determination of Environmental Rating, environmental ratings of A, B or C have been assigned to all permitted contaminants in accordance with the toxicity classifications identified in AGC/SGC tables, unless otherwise noted in this permit.

Monitoring Frequency: CONTINUOUS
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 7/30/2024.
 Subsequent reports are due every 12 calendar month(s).

Condition 3: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 6 NYCRR 212-2.3 (b)

Item 3.1:
 The Compliance Demonstration activity will be performed for the Facility.

Item 3.2:
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility shall limit the usage of the Coating Product - Thinner 08740 to 2000 gallons per year as calculated by the proposed modelling submitted with the permit application. The facility shall calculate the quantities on a monthly rolling basis. These records shall be available upon request by the agency.

The facility owner or operator shall submit an annual compliance certification demonstrating compliance with this limit to the Department on an annual basis. Such certification shall include the monthly production, and any other information necessary to demonstrate compliance with limit.

The facility owner or operator shall maintain production records on site for a period of at least ten (10)

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years.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: COATING
Upper Permit Limit: 2000 gallons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2024.
Subsequent reports are due every 12 calendar month(s).

Condition 4: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 6 NYCRR 212-2.3 (b)

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility shall limit the usage of the Coating Product - Thinner 08450 to 215 gallons per year as calculated by the proposed modelling submitted with the permit application. The facility shall calculate the quantities on a monthly rolling basis. These records shall be available upon request by the agency.

The facility owner or operator shall submit an annual compliance certification demonstrating compliance with this limit to the Department on an annual basis. Such certification shall include the monthly production, and any other information necessary to demonstrate compliance with limit.

The facility owner or operator shall maintain production records on site for a period of at least ten (10) years.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: COATING
Upper Permit Limit: 215 gallons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

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Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2024.
Subsequent reports are due every 12 calendar month(s).

Condition 5: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 5.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 5.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility shall limit the usage of the Coating Product - Galvosil 15700 to 2,000 gallons per year as calculated by the proposed modelling submitted with the permit application. The facility shall calculate the quantities on a monthly rolling basis. These records shall be available upon request by the agency.

The facility owner or operator shall submit an annual compliance certification demonstrating compliance with this limit to the Department on an annual basis. Such certification shall include the monthly production, and any other information necessary to demonstrate compliance with limit.

The facility owner or operator shall maintain production records on site for a period of at least ten (10) years.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: COATING
Upper Permit Limit: 2000 gallons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2024.
Subsequent reports are due every 12 calendar month(s).

Condition 6: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

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Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility shall limit the usage of the Coating Product - Hempaprime Multi 500 to 8,000 gallons per year as calculated by the proposed modelling submitted with the permit application. The facility shall calculate the quantities on a monthly rolling basis. These records shall be available upon request by the agency.

The facility owner or operator shall submit an annual compliance certification demonstrating compliance with this limit to the Department on an annual basis. Such certification shall include the monthly production, and any other information necessary to demonstrate compliance with limit.

The facility owner or operator shall maintain production records on site for a period of at least ten (10) years.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 8000 gallons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2024.

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

Condition 7: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

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Monitoring Description:

The facility shall limit the usage of the Coating Product - Hempadur 4774D to 52,000 gallons per year as calculated by the proposed modelling submitted with the permit application. The facility shall calculate the quantities on a monthly rolling basis. These records shall be available upon request by the agency.

The facility owner or operator shall submit an annual compliance certification demonstrating compliance with this limit to the Department on an annual basis. Such certification shall include the monthly production, and any other information necessary to demonstrate compliance with limit.

The facility owner or operator shall maintain production records on site for a period of at least ten (10) years.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 52000 gallons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2024.

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

Condition 8: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 6 NYCRR 212-2.3 (b)

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility shall limit the usage of the Coating Product - Hempadur Multi-Strength 35842 to 25,000 gallons per year as calculated by the proposed modelling submitted with the permit application. The facility shall calculate the quantities on a monthly rolling basis. These records shall be available upon request by the agency.

The facility owner or operator shall submit an annual

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compliance certification demonstrating compliance with this limit to the Department on an annual basis. Such certification shall include the monthly production, and any other information necessary to demonstrate compliance with limit.

The facility owner or operator shall maintain production records on site for a period of at least ten (10) years.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 25000 gallons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2024.

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

Condition 9: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility shall limit the usage of the Coating Product - Hempathane 55610 to 14,100 gallons per year as calculated by the proposed modelling submitted with the permit application. The facility shall calculate the quantities on a monthly rolling basis. These records shall be available upon request by the agency.

The facility owner or operator shall submit an annual compliance certification demonstrating compliance with this limit to the Department on an annual basis. Such certification shall include the monthly production, and any other information necessary to demonstrate compliance with limit.

The facility owner or operator shall maintain production records on site for a period of at least ten (10) years.

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Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: COATING
Upper Permit Limit: 14100 gallons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2024.
Subsequent reports are due every 12 calendar month(s).

Condition 10: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 6 NYCRR 212-2.3 (b)

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The facility shall limit the usage of the Coating Product - Hempadur Zinc 1736/G to 25,000 gallons per year as calculated by the proposed modelling submitted with the permit application. The facility shall calculate the quantities on a monthly rolling basis. These records shall be available upon request by the agency.

The facility owner or operator shall submit an annual compliance certification demonstrating compliance with this limit to the Department on an annual basis. Such certification shall include the monthly production, and any other information necessary to demonstrate compliance with limit.

The facility owner or operator shall maintain production records on site for a period of at least ten (10) years.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: COATING
Upper Permit Limit: 25000 gallons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.
 The initial report is due 7/30/2024.
 Subsequent reports are due every 12 calendar month(s).

Condition 11: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

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

Item 11.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: U-BOOTH Process: 002	Emission Source: RTO01
Emission Unit: U-BOOTH Process: 004	Emission Source: RTO01
Emission Unit: U-BOOTH Process: 00B	Emission Source: RTO01
Emission Unit: U-BOOTH Process: 00C	Emission Source: RTO01
Regulated Contaminant(s): CAS No: 0NY075-00-0	PARTICULATES

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5)

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years after the date of the last entry. If the operator observes any visible emissions (other than steam – see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions persist after corrections are made, the permittee will immediately notify the department and may be required to conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 6 NYCRR 228-1.6 (d)

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

When an owner and/or operator of a coating line utilizes control equipment to comply with permit requirements or regulations, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

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(1) The overall removal efficiency may be determined by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.

(2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods are contained in Part 228-1.6(d)(2) Table 'Approved VOC CE Test Methods'. Test methods 204 through 204F (M204 - M204F) are included in Appendix M of 40 CFR part 51 (see table 1, Section 200.9 of Title III). When the sampling and analysis methods described in this paragraph are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

(3) Alternative CE protocols and test methods may be allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the EPA guidance document entitled Guidelines for Determining Capture Efficiency (see table 1, Section 200.9 of Title III). The alternative CE protocols and test methods must be approved in advance by the department. Also, the multiple line testing procedures outlined in the above guidance document can be used to determine CE if the applicable criteria are satisfied. The multiple line testing CE protocols and test methods must be approved in advance by the department.

Parameter Monitored: VOC
 Lower Permit Limit: 90 percent reduction
 Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 7/30/2024.
 Subsequent reports are due every 12 calendar month(s).

Condition 13: General Provisions
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 40CFR 63, Subpart A

Item 13.1:
 This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 14: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

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

Item 14.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: U-PBLST

Emission Unit: U-TBLST

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility owns or operates a dry blasting affected source which consists of a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, the facility must comply with the following requirements:

1- The facility must capture emissions and vent them to a filtration control device. The facility must operate the filtration control device according to manufacturer's instruction, and must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified in §63.11519(c)(4).

2- The facility must implement the management practices to minimize emissions of metal fabrication HAPs (MFHAPs) by performing the following:

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2024.

Subsequent reports are due every 6 calendar month(s).

Condition 15: Compliance Demonstration

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Effective between the dates of 09/01/2023 and 08/31/2033

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

Item 15.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: U-MFR0A
Process: MAC

Emission Unit: U-MFR0B
Process: MAB

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility that owns or operates a machining affected source must implement management practices to minimize emissions of metal fabrication HAP (MFHAP) as specified below:

- 1) The facility must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as applicable; and
- 2) The facility must operate all equipment associated with machining according to manufacturer's instructions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2024.

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

Condition 16: Compliance Demonstration

Effective between the dates of 09/01/2023 and 08/31/2033

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

Item 16.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: U-MFR0A
Process: GRI

Emission Unit: U-MFR0B
Process: GRB

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Regulated Contaminant(s):
 CAS No: 0NY100-00-0 TOTAL HAP

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility performs dry grinding or dry polishing with machines, the facility must comply with the following requirements if the dry grinding and polishing operations use materials that contain metal fabrication HAP (MFHAP):

- 1) The facility must capture emissions and vent them to a filtration control device. The facility must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified in §63.11519(c)(4).
- 2) The facility must implement management practices to minimize emissions of MFHAP by:
 - taking measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
 - operating all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to the manufacturer's instructions.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2024.
 Subsequent reports are due every 6 calendar month(s).

Condition 17: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 40CFR 63.11519(a), Subpart XXXXXX

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

1. Initial notification. If you are the owner or operator of an area source in one of the nine metal fabrication and finishing source categories, as defined in § 63.11514, you must submit the initial notification required by § 63.9(b), for a new affected source no later

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than 120 days after initial startup.

Your initial notification must provide the information specified in paragraphs (a)(1)(i) through (iv) of this section.

(i) The name, address, phone number and e-mail address of the owner and operator;

(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard (i.e., this subpart); and

(iv) A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.

2.If you are the owner or operator of a new affected source, you must submit a notification of compliance status within 120 days after initial startup, or by November 20, 2008, whichever is later. You are required to submit the information specified in paragraphs (a)(2)(i) through (iv) of section 63.11519 with your notification of compliance status.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 18: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement:40CFR 63.11519(b), Subpart XXXXXX

Item 18.1:
 The Compliance Demonstration activity will be performed for the Facility.

Item 18.2:
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

1. Annual certification and compliance reports. You must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b)(2) through (7) of this section. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in paragraph (b)(3)

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of this section.

2. Dates. Unless the Administrator has approved or agreed to a different schedule for submission of reports under § 63.10(a), “General Provisions,” you must prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (b)(2)(i) through (iii) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.

(ii) Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.

(iii) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedence has occurred during the year, each annual certification and compliance report must be submitted along with the exceedence reports, and postmarked or delivered no later than January 31.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Condition 19: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement:6 NYCRR 212-2.3 (a)

Item 19.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: U-METAL

Emission Unit: U-MFR0A

Emission Unit: U-MFR0B

Regulated Contaminant(s):

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CAS No: 0NY075-00-5 PM-10

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department.

A process emission source emitting Particulate (PM-10) and having an emission rate potential (ERP) of less than 1 pound per hour and an Environmental Rating of A; must meet the twenty four hour National Ambient Air Quality Standard for Particulate of 150 ug/m³ at the fence line of the facility.

Reference Test Method: Method 5

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2024.

Subsequent reports are due every 6 calendar month(s).

Condition 20: Compliance Demonstration

Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOOTH

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

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

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOOTH

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this

Subpart must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface

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

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

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

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

(1) an enclosed spray gun cleaning system that is kept closed when not in use;

(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2024.

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

Condition 22: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 6 NYCRR 228-1.6 (f) (1)

Item 22.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-BOOTH

Process: 004

Emission Source: RTO01

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Emission Unit: U-BOOTH

Process: 00B

Emission Source: RTO01

Emission Unit: U-BOOTH

Process: 00C

Emission Source: RTO01

Item 22.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

An incinerator that is used as an air cleaning device must install a continuous monitor for exhaust gas temperature which is periodically calibrated and operated when the control equipment is operating. When temperatures fall below the approved performance test combustion temperature; immediate action must be taken to restore control equipment to its proper operating temperature.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 03/30/2024 for the period 09/01/2023 through 02/29/2024

Condition 23: Compliance Demonstration

Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement: 40CFR 63.11517(b), Subpart XXXXXX

Item 23.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-MFR0A

Emission Unit: U-MFR0B

Emission Unit: U-PBLST

Emission Unit: U-TBLST

Item 23.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. The facility must conduct the EPA Method 22 test while the affected source is

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operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period. Visual determination of fugitive emissions must be performed according to the schedule in paragraphs (1) through (4) below.

(1) Daily Method 22 Testing: Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.

(2) Weekly Method 22 Testing: If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (1) of this condition for 10 days of work day operation of the process, the facility may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, the facility must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (1) of this condition.

(3) Monthly Method 22 Testing: If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (2) of this condition, the facility may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, the facility must resume weekly EPA Method 22 in accordance with paragraph (2) of this condition.

(4) Quarterly Method 22 Testing: If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (3) of this condition, the facility may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, the facility must resume monthly EPA Method 22 in accordance with paragraph (3) of this condition.

Parameter Monitored: VISIBLE EMISSIONS

Upper Permit Limit: 0 Unitless

Reference Test Method: EPA Method 22

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 24: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

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

Item 24.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: U-MFR0A
Process: WE2

Emission Unit: U-MFR0B
Process: WEB

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For all welding operations which use metal fabrication HAPs (MFHAP) as defined in §63.11522, the facility must comply with the requirements listed in §63.11516(f)(1) and (2).

If the welding operations at the facility use at least 2000 pounds per year, calculated on a 12-month total, rolled monthly, of welding rods which contain one or more of the metal fabrication HAPs, then the facility must demonstrate that management practices or fume control measures are being implemented by complying with the requirements listed in §63.11516(f)(3)-(8).

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 25: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable Federal Requirement:40CFR 63.11519(c), Subpart XXXXXX

Item 25.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

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Emission Unit: U-MFR0A

Emission Unit: U-MFR0B

Emission Unit: U-PBLST

Emission Unit: U-TBLST

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must collect and keep records of the data and information specified in §63.11519(c)(1)-(14), according to the provisions in §63.11519(c)(15).

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2024.

Subsequent reports are due every 6 calendar month(s).

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STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) an emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) the equipment at the facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the facility owner or operator notified the department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

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

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

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.

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Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 26: Contaminant List

Effective between the dates of 09/01/2023 and 08/31/2033

Applicable State Requirement:ECL 19-0301

Item 26.1:

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

CAS No: 007439-96-5
Name: MANGANESE

CAS No: 007440-02-0
Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 007440-43-9
Name: CADMIUM

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

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

CAS No: 0NY075-00-5
Name: PM-10

CAS No: 0NY075-02-5
Name: PM 2.5

CAS No: 0NY100-00-0
Name: TOTAL HAP

Condition 27: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable State Requirement: 6 NYCRR 201-1.4

Item 27.1:

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.
- (c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.
- (d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Condition 28: Emission Unit Definition
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 28.1:

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

Emission Unit: U-BOOTH

Emission Unit Description:

U-BOOTH consists of two (2) (one large and one small) enclosed paint spray booths. Each of the two booths are equipped with staged ventilation and filtration to capture and control particulate (PM-10, PM-2.5) emissions. The booths will share a common recuperative thermal oxidizer (RTO) for control of VOC and exhaust to a common stack. The RTO has a maximum design firing rate equal to 7.35 mmBtu/hr and fires natural gas as supplemental fuel (predominately used during start up). The maximum VOC/HAP loading rate to the RTO is 165 lbs per hour.

Surface coating activities are performed on tower and transition pieces using both automated and manually operated airless spray guns. Coatings are applied to the parts in a specific sequence where the inside and outside of parts are coated and cured.

The booths are equipped with integral curing modes. Thermal energy utilized in curing mode is provided by three (3) separate hot water boilers with design heat input capacities less than 10.0 MBtu/hr each, which fire natural gas (therefore they are exempt from permitting). Flue gases from the boilers discharge to atmosphere via a single exhaust stack.

Building(s): BLDG C

Item 28.2:

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

Emission Unit: U-METAL

Emission Unit Description:

Thermal spraying (metallizing) is performed using zinc based wire to apply coating to a section (or parts of the section) to offer greater protection against corrosion. The metallizing system is equipped with a portable emission capture and control system. It will be equipped with a mobile dust collector using fabric filter media for particulate control which discharges indoors. Potential emissions may be released outdoors via building ventilation system exhaust. The building ventilation system (VNT4C) is equipped with a fabric filter for control of particulates.

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Building(s): BLDG C

Item 28.3:

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

Emission Unit: U-MFR0A

Emission Unit Description:

Includes machining, welding and grinding of steel plates and flanges inside Building A. Machining equipment (plasma arc cutting, preheating, rolling) as well as welding activities utilize oxyfuel and electricity for power.

Welding techniques employed will consist of metal inert gas (MIG), submerged arc welding (SAW), gas metal welding (GMAW), and flux-cored arc welding (FCAW)

All activities are performed indoors but have the potential to be released outdoors via Building A ventilation system vents. Potential emissions may be released from building vents due to the combustion of oxyfuel and fumes related to machining, welding and grinding activities. The building ventilation system will be equipped with fabric filters for control of particulates.

Building(s): BLDG A

Item 28.4:

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

Emission Unit: U-MFR0B

Emission Unit Description:

Includes machining, welding and grinding of steel plates and flanges inside Building B. Machining equipment (plasma arc cutting, preheating, rolling) as well as welding activities utilize oxyfuel and electricity for power.

Welding techniques employed will consist of metal inert gas (MIG), submerged arc welding (SAW), gas metal arc welding (GMAW), and flux-cored arc welding (FCAW).

All activities are performed indoors but have the potential to be released outdoors via Building B ventilation system vents. Potential emissions may be released from building vents due to the combustion of oxyfuel and fumes related to machining, welding and grinding activities. The building ventilation system will be equipped with fabric filters for control of particulates.

Building(s): BLDG B

Item 28.5:

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

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Emission Unit: U-PBLST

Emission Unit Description:

Roller conveyor wheel blast machine designed for continuous operation for the purpose of plate descaling (rust removal). The plate blast machine uses steel shot as the abrasive media and will be equipped with a high efficiency cartridge dust collector, which discharges outdoors.

Building(s): BLDG A

Item 28.6:

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

Emission Unit: U-TBLST

Emission Unit Description:

Fully enclosed blast room for the purpose of tower and transition piece descaling (rust, oxide removal). The tower blast room uses steel shot as the abrasive media and will be equipped with a dust collector and fabric filter media for particulate control which is discharged outdoors.

Building(s): BLDG C

**Condition 29: Renewal deadlines for state facility permits
Effective between the dates of 09/01/2023 and 08/31/2033**

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

Item 29.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Condition 30: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033**

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

Item 30.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

NYS Dept. of Environmental Conservation
Region 4
1130 N. Westcott Rd.
Schenectady, NY 12306

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2024.
Subsequent reports are due every 12 calendar month(s).

Condition 31: Air pollution prohibited
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable State Requirement:6 NYCRR 211.1

Item 31.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 32: Maintain all process emission sources, including the associated air pollution control and monitoring equipment
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable State Requirement:6 NYCRR 212-1.5 (g)

Item 32.1:

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safety, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Condition 33: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

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

Item 33.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: U-METAL

Emission Unit: U-MFR0A

Emission Unit: U-MFR0B

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Emission Unit: U-PBLST

Emission Unit: U-TBLST

Item 33.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

The facility owner or operator shall conduct a visible emissions observation of all emission points specified by this condition once per day while the process is in operation. The facility owner or operator will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard specified below.

The facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the limit specified (except the emission of uncombined water) are observed for three consecutive operating days from the same emission point, the facility owner or operator will notify the Department of the observations within one business day. The facility owner or operator will also perform an EPA Reference Test Method 9 opacity evaluation analysis of the affected emission point and submit the results to the Department.

Daily records of the visible emissions observations, any follow-up Method 9 observations, investigations, and corrective actions taken are to be maintained on site for a period of at least five years from the date of the record. Such records shall include the date and time of each observation, weather conditions, results of the observation, corrective actions taken, and explanations for days when weather conditions were prohibitive.

All records kept pursuant to this condition must be provided to the Department upon request.

Parameter Monitored: OPACITY

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Facility DEC ID: 4012200322

Upper Permit Limit: 20 percent
 Reference Test Method: EPA Reference Test Method 9
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2024.
 Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

Applicable State Requirement: 6 NYCRR 212-2.2

Item 34.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: U-BOOTH Process: 004	Emission Source: FLTRA
Emission Unit: U-BOOTH Process: 004	Emission Source: FLTRB
Emission Unit: U-BOOTH Process: 00C	Emission Source: FLTRC
Emission Unit: U-BOOTH Process: 00C	Emission Source: FLTRD
Emission Unit: U-METAL Process: 003	Emission Source: LFLTR
Emission Unit: U-PBLST Process: 001	Emission Source: TFLTR
Emission Unit: U-TBLST Process: 00A	Emission Source: TFLT2
Regulated Contaminant(s): CAS No: 0NY075-02-5	PM 2.5

Item 34.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Monitor pressure drop across booth fabric filters each operating day and maintain in accordance with manufacturing recommendations. A log shall be kept and available for inspection when requested. The records

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shall be kept onsite for 5 years.

Parameter Monitored: PRESSURE DROP
Lower Permit Limit: 95 percent capture efficiency
Monitoring Frequency: Hourly when in use
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2024.
Subsequent reports are due every 12 calendar month(s).

Condition 35: Compliance Demonstration
Effective between the dates of 09/01/2023 and 08/31/2033

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

Item 35.1:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 35.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of 6 NYCRR 212-2.5 (a) and (b).

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: Arithmetic average of stack test runs
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**** Emission Unit Level ****

Condition 36: Emission Point Definition By Emission Unit

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Effective between the dates of 09/01/2023 and 08/31/2033

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 36.1:

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

Emission Unit: U-BOOTH

Emission Point: 0002C

Height (ft.): 85 Diameter (in.): 74
 NYTMN (km.): 4717.737 NYTME (km.): 601.171 Building: BLDG C

Item 36.2:

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

Emission Unit: U-METAL

Emission Point: VNT4C

Height (ft.): 69 Length (in.): 36 Width (in.): 36
 NYTMN (km.): 4717.857 NYTME (km.): 601.148 Building: BLDG C

Item 36.3:

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

Emission Unit: U-MFR0A

Emission Point: VNT1A

Height (ft.): 92 Diameter (in.): 36
 NYTMN (km.): 4717.114 NYTME (km.): 601.334 Building: BLDG A

Emission Point: VNT2A

Height (ft.): 92 Diameter (in.): 36
 NYTMN (km.): 4717.165 NYTME (km.): 601.313 Building: BLDG A

Emission Point: VNT3A

Height (ft.): 92 Diameter (in.): 36
 NYTMN (km.): 4717.215 NYTME (km.): 601.291 Building: BLDG A

Emission Point: VNT4A

Height (ft.): 73 Diameter (in.): 28
 NYTMN (km.): 4717.259 NYTME (km.): 601.273 Building: BLDG A

Emission Point: VNT5A

Height (ft.): 73 Diameter (in.): 28
 NYTMN (km.): 4717.363 NYTME (km.): 601.228 Building: BLDG A

Emission Point: VNT6A

Height (ft.): 73 Diameter (in.): 28
 NYTMN (km.): 4717.364 NYTME (km.): 601.229 Building: BLDG A

Item 36.4:

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

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Emission Unit: U-MFR0B

Emission Point: VNT1B
 Height (ft.): 75 Length (in.): 64 Width (in.): 64
 NYTMN (km.): 4717.517 NYTME (km.): 601.222 Building: BLDG B

Emission Point: VNT2B
 Height (ft.): 72 Length (in.): 64 Width (in.): 64
 NYTMN (km.): 4717.509 NYTME (km.): 601.203 Building: BLDG B

Emission Point: VNT3B
 Height (ft.): 69 Length (in.): 64 Width (in.): 64
 NYTMN (km.): 4717.501 NYTME (km.): 601.186 Building: BLDG B

Emission Point: VNT4B
 Height (ft.): 66 Length (in.): 64 Width (in.): 64
 NYTMN (km.): 4717.494 NYTME (km.): 601.169 Building: BLDG B

Emission Point: VNT5B
 Height (ft.): 64 Length (in.): 64 Width (in.): 64
 NYTMN (km.): 4717.487 NYTME (km.): 601.152 Building: BLDG B

Emission Point: VNT6B
 Height (ft.): 61 Length (in.): 64 Width (in.): 64
 NYTMN (km.): 4717.479 NYTME (km.): 601.133 Building: BLDG B

Item 36.5:

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

Emission Unit: U-PBLST

Emission Point: 0001A
 Height (ft.): 30 Length (in.): 48 Width (in.): 48
 NYTMN (km.): 4717.337 NYTME (km.): 601.199 Building: BLDG A

Item 36.6:

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

Emission Unit: U-TBLST

Emission Point: 0001C
 Height (ft.): 85 Diameter (in.): 36
 NYTMN (km.): 4717.802 NYTME (km.): 601.123 Building: BLDG C

**Condition 37: Process Definition By Emission Unit
 Effective between the dates of 09/01/2023 and 08/31/2033**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 37.1:

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

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Emission Unit: U-BOOTH

Process: 002

Source Classification Code: 3-09-900-03

Process Description:

Large enclosed paint spray booth equipped with two (2) integral curing ovens with curing temperatures up to 130 degrees F. Thermal energy utilized in curing mode is provided by three (3) separate hot water boilers with design heat input capacities less than 10.0 mmBtu/hr each, which fire natural gas (the boilers are therefore exempt from permitting). Flue gases from the boilers discharge to atmosphere via a single exhaust stack.

Emission Source/Control: RTO01 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: OVENA - Process

Design Capacity: 165 pounds per hour

Emission Source/Control: OVENB - Process

Design Capacity: 165 pounds per hour

Item 37.2:

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

Emission Unit: U-BOOTH

Process: 004

Source Classification Code: 3-09-001-98

Process Description:

Large enclosed paint spray booth equipped with staged ventilation and filtration to capture and control particulate (PM-10, PM-2.5) emissions. The booth, which consists of two (2) zones, will also be equipped with a recuperative thermal oxidizer (RTO) for control of VOC.

Surface coating activities are performed on tower and transition pieces using both automated and manually operated airless spray guns. Coatings are applied to the parts in a specific sequence where the inside and outside of parts are coated.

Emission Source/Control: FLTRA - Control

Control Type: FABRIC FILTER

Emission Source/Control: FLTRB - Control

Control Type: FABRIC FILTER

Emission Source/Control: RTO01 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: UALP1 - Process

Design Capacity: 86 gallons per hour

Emission Source/Control: UTOP1 - Process

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Design Capacity: 86 gallons per hour

Item 37.3:

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

Emission Unit: U-BOOTH

Process: 00B

Source Classification Code: 3-09-900-03

Process Description:

Small enclosed paint spray booth equipped with two (2) integral curing ovens with curing temperatures up to 130 degrees F. Thermal energy utilized in curing mode is provided by three (3) separate hot water boilers with design heat input capacities less than 10.0 mmBtu/hr each, which fire natural gas (the boilers are therefore exempt from permitting). Flue gases from the boilers discharge to atmosphere via a single exhaust stack.

Emission Source/Control: RTO01 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: OVENC - Process

Design Capacity: 165 pounds per hour

Emission Source/Control: OVEND - Process

Design Capacity: 165 pounds per hour

Item 37.4:

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

Emission Unit: U-BOOTH

Process: 00C

Source Classification Code: 3-09-001-98

Process Description:

Small enclosed paint spray booth equipped with staged ventilation and filtration to capture and control particulate (PM-10, PM-2.5) emissions. The booth, which consists of two (2) zones, will also be equipped with a recuperative thermal oxidizer (RTO) for control of VOC.

Surface coating activities are performed on tower and transition pieces using both automated and manually operated airless spray guns. Coatings are applied to the parts in a specific sequence where the inside and outside of parts are coated.

Emission Source/Control: FLTRC - Control

Control Type: FABRIC FILTER

Emission Source/Control: FLTRD - Control

Control Type: FABRIC FILTER

Emission Source/Control: RTO01 - Control

Control Type: THERMAL OXIDATION

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Emission Source/Control: UALP2 - Process
 Design Capacity: 86 gallons per hour

Emission Source/Control: UTOP2 - Process
 Design Capacity: 86 gallons per hour

Item 37.5:

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

Emission Unit: U-METAL
 Process: 003 Source Classification Code: 3-09-045-00

Process Description:
 Thermal spraying (metallizing) is performed using zinc based wire to apply coating to a section (or parts of the section) to offer greater protection against corrosion.

Emission Source/Control: FABRC - Control
 Control Type: FABRIC FILTER

Emission Source/Control: LFLTR - Control
 Control Type: FABRIC FILTER

Emission Source/Control: IZING - Process
 Design Capacity: 400 pounds per hour

Item 37.6:

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

Emission Unit: U-MFR0A
 Process: GRI Source Classification Code: 3-09-001-98

Process Description:
 Belt sanding activities in designated work stations throughout Building A.

Emission Source/Control: GRINA - Process
 Design Capacity: 150 number (or quantity) per year

Item 37.7:

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

Emission Unit: U-MFR0A
 Process: MAC Source Classification Code: 3-09-046-00

Process Description:
 Various machining (oxyfuel cutting, oxyfuel preheating, rolling) of steel plates and flanges in designed work stations throughout Building A.

Emission Source/Control: FABRA - Control
 Control Type: FABRIC FILTER

Emission Source/Control: MACHA - Process
 Design Capacity: 150 number (or quantity) per year

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Item 37.8:

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

Emission Unit: U-MFR0A
Process: WE2 Source Classification Code: 3-09-044-00
Process Description:
Various oxyfuel welding activities (MIG, SAW, GMAW, FCAW)
in designated work stations throughout Building A.

Emission Source/Control: FABRA - Control
Control Type: FABRIC FILTER

Emission Source/Control: WELDA - Process
Design Capacity: 150 number (or quantity) per year

Item 37.9:

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

Emission Unit: U-MFR0B
Process: GRB Source Classification Code: 3-09-001-98
Process Description:
Belt sanding activities in designated work stations
throughout Building B.

Emission Source/Control: GRINB - Process
Design Capacity: 150 number (or quantity) per year

Item 37.10:

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

Emission Unit: U-MFR0B
Process: MAB Source Classification Code: 3-09-046-00
Process Description:
Various machining (oxyfuel cutting, oxyfuel preheating,
rolling) of steel plates and flanges in designated work
stations throughout Building B.

Emission Source/Control: FABRB - Control
Control Type: FABRIC FILTER

Emission Source/Control: MACHB - Process
Design Capacity: 150 number (or quantity) per year

Item 37.11:

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

Emission Unit: U-MFR0B
Process: WEB Source Classification Code: 3-09-044-00
Process Description:
Various oxyfuel welding activities (MIG, SAW, GMAW, FCAW)
in designated work stations throughout Building B

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322

Emission Source/Control: FABRB - Control
Control Type: FABRIC FILTER

Emission Source/Control: WELDB - Process
Design Capacity: 150 number (or quantity) per year

Item 37.12:

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

Emission Unit: U-PBLST
Process: 001 Source Classification Code: 3-09-002-07
Process Description:
Roller conveyor wheel blast machine for continuous operation for the purpose of plate descaling (rust removal). The plate blast machine uses steel shot as the abrasive media and will be equipped with a dust collector and fabric filter media.

Emission Source/Control: TFLTR - Control
Control Type: FABRIC FILTER

Emission Source/Control: BLAST - Process
Design Capacity: 30,000 pounds adhesive used per hour

Item 37.13:

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

Emission Unit: U-TBLST
Process: 00A Source Classification Code: 3-09-002-07
Process Description:
Fully enclosed blast room for the purpose of tower and transition piece descaling (rust, oxide removal). The tower blast room uses steel shot as the abrasive media and will be equipped with a dust collector and fabric filter media for particulate control which is discharged outdoors.

Emission Source/Control: TFLT2 - Control
Control Type: FABRIC FILTER

Emission Source/Control: BLAS2 - Process
Design Capacity: 3,500 pounds adhesive used per hour

Permit ID: 4-0122-00322/00006

Facility DEC ID: 4012200322