



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 3-3352-00145/00049
Mod 0 Effective Date: 11/15/2007 Expiration Date: 11/14/2012

Mod 1 Effective Date: Expiration Date:

Permit Issued To: REVERE SMELTING & REFINING CORP
2777 STEMMINS FREEWAY - SUITE 1800
DALLAS, TX 75207

Contact: GEORGE CUMMINS
ECO-BAT NY LLC
2777 STEMMONS FWY
DALLAS, TX 75207
(214) 583-0240

Facility: REVERE SMELTING & REFINING CORP
65 BALLARD RD
MIDDLETOWN, NY 10941

Contact: JAMES WALSH
REVERE SMELTING & REFINING CORP
65 BALLARD RD
MIDDLETOWN, NY 10941
(845) 692-4414

Description:

Modification 1

Project proposes installation of a short rotary furnace (SRF) to process slag produced by the existing reverberatory furnace. The SRF is sized to process a maximum of 100 tons per day batch of charge material, lead bearing reverberatory slag and reagents. The SRF is designed to operate a 10MMBTU/hour low NOx burner which fires natural gas as fuel. The burner combines pure oxygen with the natural gas to enhance combustion. Controls supporting the operation of the SRF include a baghouse collector and scrubber. The baghouse collector is required to effectively control particulate and lead emissions. The scrubber is needed to provide sulfur dioxide control efficiency. The operation of the SRF firing natural gas fuel utilizing low NOx burners which combines pure oxygen to the fuel is considered Reasonably Available Control Technology (RACT) for Oxides of Nitrogen (NOx).

Operation of the SRF will eliminate a situation where reverberatory slag generated onsite is shipped (railcar) to sister facilities located in California and Indiana and portion of recovered lead return shipped (railcar / tractor-trailor) to the Revere Smelting & Refining Middletown facility for further refining. The existing reverberatory furnace generates some 1,650 tons of slag per month intended for further processing within the SRF. Past analysis indicate the reverberatory slag contains some 3% sulfur by weight. A low lead content slag will be generated by the SRF which will be sent off site for



processing and disposal.

The SRF project anticipates minimal impact to current refinery process elements which include an increase in sodium nitrate (niter) addition and increased natural gas consumption to support the refining kettle operations. These increases are attributable to the quality and mix of the lead refinery product and associated emissions accounted for within permit conditions as appropriate.

The permit application (June 2007 as supplemented December 2007) to install and operate the SRF discusses the concept of process operations currently constrained because of the absence of the proposed SRF. Bottlenecking is the term used to describe this concept. In particular, the question is, does the proposed project impact the operation of existing upstream or downstream process sources. The impact may be considered for either increased or decreased productivity and associated emissions which are therefore attributable to the proposed source project. The following represents a summary evaluation of "bottlenecking" as applied to the installation of the SRF source project.

1. The source project will not enhance upstream capabilities of the existing reverberatory furnace.
2. The source project will impact downstream kettle refining with increase natural gas usage and increased niter addition. Emissions from these processes are therefore accounted for as part of the proposed SRF project as indicated above.

Regulatory review consideration associated with the SRF project include but not limited to applicability of Prevention of Significant Deterioration (40CFR Part 52.21), applicability of non attainment New Source Review (6NYCRR Part 231-2), General Process Emission Sources (6NYCRR Part 212), New Source Performance Standards for Secondary Lead Smelters (40CFR Part 60-L) and National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting (40CFR Part 63-X).

The following summarizes pollutant limits required by the modified Title V permit which are associated with the installation and operation of the SRF.

Carbon Monoxide

SRF - 22.0 lbs per hr which is 96.36 tons per year

Natural Gas - 12.8 million cf/yr increase in refining operation which is 0.54 tons per year

Total project CO emissions ~ 96.90 tons per year < 100 tons per year (40CFR 52.21)

Compliance with short term and annual limit determined by initial and subsequent performance test required on SRF exhaust excluding dryer kiln.

Regulatory limits based on PSD significant project threshold.

Oxides of Nitrogen (NOx)

SRF - 6.5 lbs per hr which is 28.47 tons per year

Natural Gas - 12.8 million cf / yr increase usage in refining operation which is 0.64 tons per year NOx increase.

Sodium Nitrate (Niter) - 22.4 tons per year usage increase in refining operation which is 7.05 tons per year NOx increase.

Total project NOx ~ 36.16 tons per year < 40 tons per year (6NYCRR 231-2)



Compliance with short term limit of 7.7 lbs/hr (6.5 lb/hr + 1.2 lb/hr) determined by the existing EP00001 Continuous Monitoring System (CMS) which measures combined exhaust of kiln dryer and SRF. The 1.2 lb/hr represents baseline emissions established for the existing kiln dryer. CMS design and performance criteria outlined by 40CFR Part 60 Appendix A and F.

Regulatory limits are based on nonattainment New Source Review significant project threshold and Reasonably Available Control Technology. Emissions and performance reporting required quarterly.

Sulfur Dioxide (SO₂)

SRF - 8.8 lbs per hr which is 38.54 tons per year

Natural gas - negligible

Total project SO₂ emissions ~ 38.54 tons per year < 40 tons per year (40CFR 52.21)

Compliance with short term and annual limit determined by new CEM which directly measures exhaust from SRF prior to combining with kiln dryer exhaust within EP00001. CMS design and performance criteria outlined by 40CFR Part 60 Appendix A and F. Emissions and performance reporting required quarterly.

Regulatory limits based on PSD significant project threshold. SO₂ Emission Rate Potential of the SRF combined with existing dryer kiln estimated between 100 lbs and 500 lbs per hr. As a General Process Source subject to 6NYCRR Part 212, a 94% degree of air cleaning is required. Initial performance testing is required to confirm removal efficiency. Subsequent performance testing will be required by future Title V permit renewals.

PM-10

SRF - 0.0065 gr per dscf which is ~3.34 lbs per hr and ~ 14.64 tons per year

Natural gas - negligible

Total project PM-10 emissions ~ 14.64 tons per year < 15 tons per year (CP-33 and PSD significant project threshold).

Compliance with short term and annual limit determined by initial and subsequent annual performance testing conducted exclusively on SRF exhaust .

Particulate

SRF - 0.022 gr per dscf

This limit is based on 40CFR 60.122 Subpart L, Standards of Performance for Secondary Lead Smelters. An initial performance test is required to confirm compliance.

Volatile Organic Compound (VOC)

SRF - 3.42 lbs per hr which is 15.0 tons per year



Natural gas - negligible

Total project VOC emissions ~ 15.0 tons per year < 40 tons per year (6NYCRR 231-2)

Compliance with short term and annual limit determined by initial performance testing conducted exclusively on SRF exhaust . Subsequent performance testing will be required by future Title V permit renewals.

Regulatory limits based on nonattainment New Source Review significant project threshold.

Lead (Pb)

SRF - 0.00026 gr per dscf which is ~ 0.13 lbs per hr and ~ 0.57 tons per year

Natural gas - negligible

Increased kettle refining - negligible (baghouse is a constant outlet concentration control device)

Total project Lead emissions ~ 0.57 tons per year < 0.6 tons per year (40CFR 52.21)

Compliance with short term and annual limit determined by initial and subsequent performance testing conducted exclusively on SRF exhaust outlet concentration control device.

The SRF is subject to 40CFR 63.544 Subpart X, National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting, lead emission limit of 0.00087 gr per dscf. However, the lower limit specified shall govern and is based on PSD significant project threshold.

Arsenic (As)

Combined SRF and Kiln Dryer (EP00001) - 0.0014 lbs per hour

Reverberatory Furnace (EP00017) - 0.0033 lbs per hour

Compliance with short term limit determined by initial performance testing and is based on verifying minimal air toxics impact.

Cadmium (Cd)

Combined SRF and Kiln Dryer (EP00001)- 0.0012 lbs per hour

Compliance with short term limit determined by initial performance testing and is based on verifying minimal air toxics impact.

Administrative Record

Application for Construction and Operation of a Short Rotating Furnace submitted by Revere Smelting & Refining June 2007.

NYSDEC letter dated September 28, 2007 to USEPA requesting PSD applicability review.

NYSDEC e-mail dated October 16, 2007 to Revere Smelting & Refining requesting revision to air toxic modeling.

Revised air toxic modeling submitted by ENVIRON on behalf of Revere Smelting & Refining October



30, 2007.

NYSDEC letter dated November 9, 2007 to Revere Smelting & Refining providing comment to permit application.

Title V Permit renewal 1 (existing operation) issued November 15, 2007.

USEPA letter dated November 20, 2007 to Revere Smelting & Refining providing comment to permit application.

Revere Smelting & Refining letter dated December 7, 2007 to NYSDEC transmitting completed Environmental Assessment Form.

Revere Smelting & Refining letter dated December 20, 2007 to USEPA responding to the November 20, 2007 comments.

Revere Smelting & Refining letter dated December 20, 2007 to NYSDEC responding to the November 9, 2007 comments.

NYSDEC e-mail January 8, 2007 to Revere Smelting & Refining outlining options to consider regarding 6NYCRR Part 231-2 NSR based on SRF as a modification to an existing emission unit.

NYSDEC Region 3 telephone communication with NYSDEC Central Office January 9, 2007 affirming 6NYCRR 231-2 review concept of the proposed SRF as modification to an existing emission unit.

NYSDEC and USEPA telephone conversation January 10, 2007 concerning past reveratory furnace scrubber control efficiency, permitting of the seventh kettle as aggregating with the proposed SRF and conceptual difference with 6NYCRR 231-2 and 40CFR Part 52 review concepts.

Meeting 1/24/2008 with Revere Smelting & Refining at NYSDEC Central Office concerning identification of source project SRF emission unit and emission point associations.

Preliminary draft permit provided to Revere Smelting & Refining and USEPA via e-mail February 12, 2008.

Revere Smelting & Refining preliminary draft comments received March 6, 2008.

AFS application information transmitted March 19, 2008 to Revere Smelting & Refining for review and certification.

Internal NYSDEC memorandum April 14, 2008 providing acceptance of air toxics modeling protocol.

Revere Smelting & Refining transmit AFS permit application with "mark-up" information received by NYSDEC April 16, 2008.

USEPA comment on preliminary draft permit provided via electronic mail April 29, 2008.

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: MICHAEL D MERRIMAN
DIVISION OF ENVIRONMENTAL PERMITS
21 SOUTH PUTT CORNERS RD
NEW PALTZ, NY 12561-1696

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of Applications for Permit Modification or Renewal-REGION 3 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

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: 6NYCRR 621.11

Item 3.1:

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

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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



transfer of ownership.

Condition 4: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:

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 4.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 4.3:

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 5: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 5.1:

The Department reserves the right 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.

Condition 6: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 6.1:

The Department reserves the right 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 7: Submission of Applications for Permit Modification or Renewal-REGION 3 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.5(a)

Item 7.1:

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

NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054

Condition 8: Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.6(a)

Item 8.1:

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

NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: REVERE SMELTING & REFINING CORP
2777 STEMMINS FREEWAY - SUITE 1800
DALLAS, TX 75207

Facility: REVERE SMELTING & REFINING CORP
65 BALLARD RD
MIDDLETOWN, NY 10941

Authorized Activity By Standard Industrial Classification Code:
3341 - SECONDARY NONFERROUS METALS

Permit Effective Date:

Permit Expiration Date:



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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Facility Level

- Submission of Applications for Permit Modification or Renewal-REGION 3 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 23 6NYCRR 201-6: Emission Unit Definition
- 1-1 6NYCRR 212.4(c): Compliance Certification
- 24 6NYCRR 212.4(c): Compliance Certification
- 25 6NYCRR 212.5(b): Compliance Certification
- 1-2 6NYCRR 212.6(a): Compliance Certification
- 26 6NYCRR 212.6(a): Compliance Certification
- 1-3 6NYCRR 212.10: Compliance Certification
- 27 6NYCRR 212.10: Compliance Certification
- 1-4 6NYCRR 212.11: Compliance Certification
- 1-5 6NYCRR 212.11(b)(5): Compliance Certification
- 28 6NYCRR 212.11(b)(5): Compliance Certification
- 1-6 40CFR 60.122(a), NSPS Subpart L: Compliance Certification
- 1-7 40CFR 60.122(a), NSPS Subpart L: Compliance Certification
- 1-8 40CFR 60.122(a), NSPS Subpart L: Compliance Certification
- 1-9 40CFR 60.122(a), NSPS Subpart L: Compliance Certification
- 31 40CFR 60.122(a), NSPS Subpart L: Compliance Certification
- 32 40CFR 60.122(a), NSPS Subpart L: Compliance Certification
- 1-10 40CFR 60.122(b), NSPS Subpart L: Compliance Certification
- 33 40CFR 60.122(b), NSPS Subpart L: Compliance Certification
- 1-11 40CFR 63.10, Subpart A: Compliance Certification
- 36 40CFR 63.10, Subpart A: Compliance Certification
- 1-12 40CFR 63.543, Subpart X: Compliance Certification
- 38 40CFR 63.543, Subpart X: Compliance Certification
- 1-13 40CFR 63.544, Subpart X: Compliance Certification
- 39 40CFR 63.544, Subpart X: Compliance Certification
- 1-14 40CFR 63.544(b), Subpart X: Compliance Certification
- 40 40CFR 63.544(b), Subpart X: Compliance Certification
- 1-15 40CFR 63.548, Subpart X: Compliance Certification
- 42 40CFR 63.548, Subpart X: Compliance Certification

Emission Unit Level

- 43 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 44 6NYCRR 201-6: Process Definition By Emission Unit



1-16 6NYCRR 201-7: Emission Unit Permissible Emissions

1-17 6NYCRR 201-7: Process Permissible Emissions

EU=1-0LEAD

45 6NYCRR 212.10: Compliance Certification

EU=1-0LEAD,Proc=NIT

*1-18 6NYCRR 201-7: Capping Monitoring Condition

EU=1-0LEAD,Proc=REF

*1-19 6NYCRR 201-7: Capping Monitoring Condition

EU=1-0LEAD,EP=00017

1-20 6NYCRR 212.9: Compliance Certification

EU=1-SRFKD,Proc=SRF

1-21 6NYCRR 212.10(a)(2): Compliance Certification

EU=1-SRFKD,EP=00001

*1-22 6NYCRR 201-7: Capping Monitoring Condition

*1-23 6NYCRR 201-7: Capping Monitoring Condition

1-24 6NYCRR 212.9: Compliance Certification

EU=1-SRFKD,EP=00001,Proc=SRF

*1-25 6NYCRR 201-7: Capping Monitoring Condition

*1-26 6NYCRR 201-7: Capping Monitoring Condition

*1-27 6NYCRR 201-7: Capping Monitoring Condition

*1-28 6NYCRR 201-7: Capping Monitoring Condition

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

47 ECL 19-0301: Contaminant List

Emission Unit Level

EU=1-0LEAD,EP=00017

1-29 6NYCRR 212.9(a): Compliance Demonstration

EU=1-SRFKD,EP=00001

1-30 6NYCRR 212.9(a): Compliance Demonstration

1-31 6NYCRR 212.9(a): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

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

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

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

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

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

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



- Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**



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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the



effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item L: Permit Exclusion - ECL 19-0305

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



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

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

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 23: Emission Unit Definition

Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-6

Item 23.1(From Mod 1):

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

Emission Unit: 1-0LEAD

Emission Unit Description:

THIS EMISSION UNIT INCLUDES: REVERBERATORY FURNACE SYSTEM, SLAG CASTING, REFINING KETTLES AND ASSOCIATED MATERIAL HANDLING EQUIPMENT. A NEGATIVE PRESSURE SYSTEM IS USED AT THE FACILITY TO CONTROL PROCESS SOURCES (63.543), PROCESS FUGITIVE SOURCES (63.544) AND FUGITIVE DUST SOURCES (63.545). COLLECTED AIR FROM ASSOCIATED SOURCES ARE VENTED TO TWELVE (12) SEPERATE BAGHOUSE UNITS TO CONTROL LEAD AND PARTICULATE EMISSIONS.

NINE (9) BAGHOUSE UNITS ARE USED TO CONTROL LEAD EMISSIONS ASSOCIATED WITH THE YARD BUILDING AREAS, REFINING AREAS, LEAD TAP AND FEED ROOM. EIGHT (8) OF THESE NINE (9) BAGHOUSE UNITS ARE PULSE TYPE HEPA FILTERS (PERMIT ID B6, B7, B8, B9, B10, B11, B12, B13) WITH ONE (1) BAGHOUSE UNIT (PERMIT ID B5) SITUATED UPSTREAM OF HEPA UNITS B6 AND B7.

THE REMAINING THREE (3) BAGHOUSE UNITS (PERMIT ID B1, B2, AND B4) CONTROL LEAD EMISSIONS FROM PROCESS SOURCES INCLUDING REVERBERATORY FURNACE SYSTEM, SLAG CASTING, REFINERY KETTLES AND ASSOCIATED MATERIAL HANDLING EQUIPMENT. THESE BAGHOUSE UNITS



ARE SUBJECT TO THE PROPER OPERATION OF LEAK DETECTION SYSTEMS.

A SCRUBBER IS USED REMOVE SULFUR FROM THE REVERBERATORY FURNACE GAS STREAM. A 97% CONTROL EFFICIENCY OF SULFUR DIOXIDE EMISSIONS IS REQUIRED.

Building(s): MAIN

Item 23.2(From Mod 1):

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

Emission Unit: 1-SRFKD

Emission Unit Description:

SHORT ROTARY FURNACE (SRF) AND ROTATING KILN DRYER. THE SRF IS EQUIPPED WITH A 10 MMBTU/HR LOW NOX BURNER. BOTH COMBUSTION UNITS FIRE NATURAL GAS AS FUEL AND UTILIZE BURNERS WHICH COMBINES PURE OXYGEN TO THE FUEL TO ENHANCE COMBUSTION. BAGHOUSE UNITS (PERMIT IDS B3 AND SRFBH) ARE USED TO CONTROL LEAD AND PARTICULATE EMISSIONS. THESE BAGHOUSE UNITS ARE SUBJECT TO THE PROPER OPERATION OF LEAK DETECTION SYSTEMS. THE SRF IS ALSO EQUIPPED WITH A SCRUBBER DEVICE TO CONTROL SULFUR DIOXIDE EMISSIONS.

Building(s): MAIN

Item 23.3(From Mod 1):

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

Emission Unit: 2-CRYST

Emission Unit Description:

SODIUM SULFATE CRYSTALLIZER OPERATION WHICH CONVERTS LIQUOR FROM THE ONSITE SULFUR DIOXIDE WET SCRUBBER AND NEUTRALIZED BATTERY ELECTROLYTE INTO SODIUM SULFATE CRYSTALS. THIS EMISSION UNIT CONSIST OF TWO PROCESS LINES INCLUDING THE SPRAY DRYER EQUIPPED WITH A BAGHOUSE (EP00024) AND THE DRYER, CYCLONE AND SCRUBBER (EP00014). SODIUM SULFATE PRODUCT IS STORED IN THREE SILOS. THE SILOS ARE EXEMPT SINCE THEY ARE CONNECTED IN SERIES AND VENTED THROUGH A BAGHOUSE COLLECTOR.

THE CRYSTALLIZER OPERATION UTILIZES AN EXEMPT EMERGENCY GENERATOR (EP00020) TO SUPPLY ELECTRIC DURING PERIODS WHEN UTILITY SERVICE IS UNAVAILABLE.



Building(s): CRYST

Item 23.4(From Mod 0):

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

Emission Unit: 3-GENER

Emission Unit Description:

TWO 30 mmBTU/hr DIESEL GENERATORS ARE USED TO PROVIDE SUPPLEMENTAL POWER WHEN REQUESTED BY THE UTILITY COMPANY, AND DURING POWER OUTAGES. THESE GENERATORS ARE LIMITED TO 500 HOURS (ANNUAL 12 MONTH ROLLING AVERAGE) AS PER APPROVED NOX RACT PLAN.

Building(s): MAIN

Item 23.5(From Mod 0):

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

Emission Unit: 4-BOILR

Emission Unit Description:

A 12.5 MMBTU/HR BOILER (EP00015) IS USED TO SUPPLY PROCESS HEAT NEEDED TO OPERATE THE CRYSTALLIZATION PROCESS. THE BOILER FIRES NATURAL GAS AND IS EQUIPPED WITH LOW NOX BURNERS AND FLUE GAS RECIRCULATION AS STIPULATED BY THE APPROVED NOX RACT PLAN.

Building(s): CRYST

**Condition 1-1: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 212.4(c)

Replaces Condition(s) 24

Item 1-1.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD	Emission Point: 00002
Emission Unit: 1-0LEAD	Emission Point: 00004
Emission Unit: 1-0LEAD	Emission Point: 00007
Emission Unit: 1-0LEAD	Emission Point: 00008
Emission Unit: 1-0LEAD	Emission Point: 00009
Emission Unit: 1-0LEAD	Emission Point: 00010
Emission Unit: 1-0LEAD	Emission Point: 00011



Emission Unit: 1-0LEAD Emission Point: 00012

Emission Unit: 1-0LEAD Emission Point: 00016

Emission Unit: 2-CRYST Emission Point: 00014

Emission Unit: 2-CRYST Emission Point: 00024

Emission Unit: 1-SRFKD Emission Point: 00001

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

Item 1-1.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing shall be conducted at the request of the Department.

At least 60 days prior to actual testing, Revere Smelting & Refining shall submit to NYSDEC a test protocol detailing methods and procedures to be used during the compliance test. Results must be submitted to NYSDEC within 60 days after completion of compliance testing.

Compliance test for emissions of particulate shall be conducted using 40CFR Part 60, Appendix A, Method 5.

For clarification, this limit applies to exclusive operation of the dryer kiln exhausted to EP00001, exclusive operation of the short rotary furnace exhausted to EP00001 and operation of the reverberatory furnace exhausted to EP00017. Each of these sources are subject to separate permit conditions which specify a lower emissions limit of 0.022 grains of particulate per cubic foot of exhaust gas under 40CFR60.122 Subpart L.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED



Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 24: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.4(c)

Replaced by Condition(s) 1-1

Item 24.1:

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

Emission Unit: 1-0LEAD	Emission Point: 00002
Emission Unit: 1-0LEAD	Emission Point: 00004
Emission Unit: 1-0LEAD	Emission Point: 00007
Emission Unit: 1-0LEAD	Emission Point: 00008
Emission Unit: 1-0LEAD	Emission Point: 00009
Emission Unit: 1-0LEAD	Emission Point: 00010
Emission Unit: 1-0LEAD	Emission Point: 00011
Emission Unit: 2-CRYST	Emission Point: 00014
Emission Unit: 2-CRYST	Emission Point: 00024
Emission Unit: 1-0LEAD	Emission Point: 00001
Emission Unit: 1-0LEAD	Emission Point: 00012
Emission Unit: 1-0LEAD	Emission Point: 00016

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

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing shall be conducted at the request of the Department.

At least 60 days prior to actual testing, Revere shall



submit to NYSDEC a test protocol detailing methods and procedures to be used during the compliance test. Results must be submitted to NYSDEC within 60 days after completion of compliance testing.

Compliance test for emissions of particulate shall be conducted using 40CFR Part 60, Appendix A, Method 5.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.05 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 12 calendar month(s).

Condition 25: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.5(b)

Expired by Mod 1

Item 25.1:

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

Emission Unit: 1-0LEAD Emission Point: 00001

Emission Unit: 1-0LEAD Emission Point: 00017

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The sum of sulfur dioxide emissions from Emission Points 00001 and 00017 shall be controlled at 97%. Compliance testing shall be demonstrated once per permit term.

At least 60 days prior to actual testing, Revere shall submit to NYSDEC a test protocol detailing methods and procedures to be used during the compliance test. Results must be submitted to NYSDEC within 60 days after completion of compliance testing.

Compliance test to determine control of sulfur dioxide



emissions shall be conducted using 40CFR Part 60, Appendix A, Method 6.

Manufacturer Name/Model Number: Unk
Parameter Monitored: SULFUR DIOXIDE
Lower Permit Limit: 97 percent
Reference Test Method: Method 6
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-2: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.6(a)

Replaces Condition(s) 26

Item 1-2.1:

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

Emission Unit: 1-0LEAD	Emission Point: 00004
Emission Unit: 1-0LEAD	Emission Point: 00007
Emission Unit: 1-0LEAD	Emission Point: 00008
Emission Unit: 1-0LEAD	Emission Point: 00009
Emission Unit: 1-0LEAD	Emission Point: 00010
Emission Unit: 1-0LEAD	Emission Point: 00011
Emission Unit: 2-CRYST	Emission Point: 00014
Emission Unit: 2-CRYST	Emission Point: 00024
Emission Unit: 1-0LEAD	Emission Point: 00012
Emission Unit: 1-0LEAD	Emission Point: 00016

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

Item 1-2.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Revere Smelting & Refining is prohibited from causing or allowing 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 a Method 9 opacity evaluation at any time during facility operation.

Opacity limit applicable to the reverberatory furnace (EP00017), operation of the short rotary furnace (EP00001) and refining kettles (EP00002) are defined by separate permit conditions under 40CFR 60-L.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 26: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.6(a)

Replaced by Condition(s) 1-2

Item 26.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD	Emission Point: 00004
Emission Unit: 1-0LEAD	Emission Point: 00007
Emission Unit: 1-0LEAD	Emission Point: 00008
Emission Unit: 1-0LEAD	Emission Point: 00009
Emission Unit: 1-0LEAD	Emission Point: 00010
Emission Unit: 1-0LEAD	Emission Point: 00011
Emission Unit: 1-0LEAD	Emission Point: 00001
Emission Unit: 2-CRYST	Emission Point: 00014
Emission Unit: 2-CRYST	Emission Point: 00024

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



Item 26.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Revere is prohibited from causing or allowing 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 a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 1-3: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 212.10

Replaces Condition(s) 27

Item 1-3.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD

Emission Point: 00017

Regulated Contaminant(s):

CAS No: 007446-09-5

SULFUR DIOXIDE

CAS No: 0NY210-00-0

OXIDES OF NITROGEN

Item 1-3.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In support of documenting compliance, Revere Smelting & Refining shall continue to submit a Continuous Emissions Monitoring (CEM) summary report for the reverberatory furnace scrubber emission point 00017. The summary report



shall be submitted quarterly and contain the following information:

1. Daily tabulation of actual continuous monitor system (CMS) operation time;
2. Daily tabulation of CMS downtime;
3. Summary outlining cause of CMS downtime;
4. Daily tabulation of measured SO2 emissions in terms of ppm and lbs/hr;
5. Daily tabulation of measured NOx emissions in terms of ppm and lbs/hr;
6. Identification of any exceedances and description of corrective action; and
7. Information on any changes to process equipment, control or CMS components.

Monitoring Frequency: CONTINUOUS
 Reporting Requirements: QUARTERLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 3 calendar month(s).

Condition 27: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.10

Replaced by Condition(s) 1-3

Item 27.1:
 The Compliance Certification activity will be performed for the facility:
 The Compliance Certification applies to:

Emission Unit: 1-0LEAD Emission Point: 00001

Emission Unit: 1-0LEAD Emission Point: 00017

Regulated Contaminant(s):
 CAS No: 007446-09-5 SULFUR DIOXIDE
 CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 27.2:
 Compliance Certification shall include the following monitoring:

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

Monitoring Description:
 NOx emissions from the rotary kiln (EP 00001) shall not exceed 5.04 lbs/hr per operating hour based on a twelve month rolling average.

In support of documenting compliance, Revere shall continue to submit a Continuous Emissions Monitoring (CEM) summary report for the rotary kiln (EP 00001) and scrubber (EP 00017). The summary report shall be submitted



semi-annually and contain the following information:

1. Daily tabulation of actual continuous monitor system (CMS) operation time;
2. Daily tabulation of CMS downtime;
3. Summary outlining cause of CMS downtime;
4. Daily tabulation of measured SO₂ emissions in terms of ppm and lbs/hr;
5. Daily tabulation of measured NO_x emissions in terms of ppm and lbs/hr;
6. Identification of any exceedances and description of corrective action; and
7. Information on any changes to process equipment, control or CMS components.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 5.04 pounds per hour

Monitoring Frequency: CONTINUOUS

Averaging Method: 12-month rolling average

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 1-4: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 212.11

Item 1-4.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-SRFKD

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 007446-09-5

SULFUR DIOXIDE

Item 1-4.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In support of documenting compliance, Revere Smelting & Refining shall submit a Continuous Emissions Monitoring (CEM) summary report for the combined dryer kiln and short rotary furnace emission point 00001. The summary report shall be submitted quarterly and contain the following information:

1. Daily tabulation of actual continuous monitor system (CMS) operation time;
2. Daily tabulation of CMS downtime;



3. Summary outlining cause of CMS downtime;
4. Daily tabulation of measured SO₂ emissions in terms of ppm and lbs/hr;
5. Identification of any exceedances and description of corrective action; and
6. Information on any changes to process equipment, control or CMS components.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 3 calendar month(s).

Condition 1-5: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.11(b)(5)

Replaces Condition(s) 28

Item 1-5.1:

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

Emission Unit: 1-0LEAD Emission Point: 00002

Emission Unit: 1-0LEAD Emission Point: 00017

Item 1-5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Revere Smelting & Refining shall continue to operate
Continuous Monitoring Systems (CMSs) systems as
follows.

Kettle Stack EP 00002
COM

Reverberatory Furnace Stack EP 00017
CEM - NO_x, SO_x, Flow

CMSs systems shall conform with design and performance criteria outlined in 40 CFR 60 Appendix A. CEMs shall be operated in accordance with Quality Assurance Procedures outlined by 40 CFR 60, Appendix F. This includes, but not limited to, implementing a Quality Control Program (40 CFR 60-F.1), quarterly Data Accuracy Assessment (40 CFR 60-F.5) and Reporting Requirements (40 CFR 60-F.7).

Operation of COM shall comply with 40 CFR 60, Appendix B -



Performance Specification 1.

Continuous monitors must be operated at all times when the associated process equipment is operating except during any quality assurance and routine maintenance activities.

Operation of CMSs required for the kiln dryer and short rotary furnace emission point 00001 are defined by separate permit conditions under 6NYCRR 201-7.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 3 calendar month(s).

Condition 28: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.11(b)(5)

Replaced by Condition(s) 1-5

Item 28.1:
The Compliance Certification activity will be performed for the Facility.

Item 28.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Revere shall continue to operate Continuous Emission Monitors (CEMs) and or Continuous Opacity Monitors (COMs) systems as follows.

Kiln Dryer Stack EP 00001
CEM - NO_x, SO_x, Flow
COM

Kettle Stack EP 00002
COM

Reverberatory Furnace Stack EP 00017
CEM - NO_x, SO_x, Flow

CEMs systems shall conform with design and performance criteria outlined in 40 CFR 60 Appendix A. CEMs shall be operated in accordance with Quality Assurance Procedures outlined by 40 CFR 60, Appendix F. This includes, but not limited to, implementing a Quality Control Program (40 CFR 60-F.1), quarterly Data Accuracy Assessment (40 CFR 60-F.5) and Reporting Requirements (40 CFR



60-F.7).

Operation of COM systems shall comply with 40 CFR 60, Appendix B - Performance Specification 1.

Continuous monitors must be operated at all times when the associated process equipment is operating except during any quality assurance and routine maintenance activities.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 3 calendar month(s).

Condition 1-6: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.122(a), NSPS Subpart L

Item 1-6.1:

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

Emission Unit: 1-0LEAD Emission Point: 00017

Item 1-6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates from the reverberatory furnace are limited to less than 0.022 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing shall be conducted at the request of the Department.

At least 60 days prior to actual testing, Revere Smelting & Refining shall submit to NYSDEC a Test Protocol detailing methods and procedures to be used during the compliance test. Results must be submitted to NYSDEC within 60 days after completion of compliance testing.

Compliance test for emissions of particulate shall be conducted using 40CFR Part 60, Appendix A, Method 5.



Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.022 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-7: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.122(a), NSPS Subpart L

Replaces Condition(s) 32

Item 1-7.1:

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

Emission Unit: 1-0LEAD Emission Point: 00017

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

Item 1-7.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Revere Smelting & Refining is prohibited from causing or allowing emissions having an average opacity during any six consecutive minutes of 20 percent or greater from the reverberatory furnace emission source, except only the emission of uncombined water.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9 / COM
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 1-8: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement:40CFR 60.122(a), NSPS Subpart L

Item 1-8.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-SRFKD

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-8.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Revere Smelting & Refining is prohibited from causing or allowing emissions having an average opacity during any six consecutive minutes of 20 percent or greater from the short rotary furnace (SRF) emission source (EP 00001), except only the emission of uncombined water.

Revere Smelting & Refining shall perform an initial Method 9 evaluation within 60 days of SRF startup. The Department reserves the right to perform or require Revere Smelting & Refining perform subsequent Method 9 opacity evaluations.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9 / COM

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-9: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 60.122(a), NSPS Subpart L

Replaces Condition(s) 31

Item 1-9.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-SRFKD

Emission Point: 00001

Item 1-9.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:



Emissions of solid particulates from the combined short rotary furnace (SRF) and dryer kiln are limited to less than 0.022 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Within 60 days after achieving the maximum production rate of the SRF, but no later than 180 days after initial startup as defined in 40 CFR Part 60.2, Revere Smelting & Refining shall conduct an initial performance tests for Particulate emissions. All performance tests shall be conducted at the maximum design operating capacity of the unit(s) being tested and/or other loads specified by NYSDEC and or EPA.

At least 60 days prior to actual testing, the facility shall submit to the NYSDEC a Test Protocol detailing methods and procedures to be used during the performance stack testing.

Performance tests to determine the stack gas velocity, sample area, volumetric flowrate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40CFR Part 60, Appendix A, Methods 1,2 3, and 4.

Performance test results must be reported to NYSDEC within 60 days after completion of compliance testing.

Compliance test for emissions of particulate shall be conducted using 40CFR Part 60, Appendix A, Method 5.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.022 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: SINGLE OCCURRENCE
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 31: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.122(a), NSPS Subpart L

Replaced by Condition(s) 1-9

Item 31.1:

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



Emission Unit: 1-0LEAD

Emission Point: 00017

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates from the reverberatory furnace are limited to less than 0.022 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing shall be conducted at the request of the Department.

At least 60 days prior to actual testing, Revere shall submit to NYSDEC a test protocol detailing methods and procedures to be used during the compliance test. Results must be submitted to NYSDEC within 60 days after completion of compliance testing.

Compliance test for emissions of particulate shall be conducted using 40CFR Part 60, Appendix A, Method 5.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.022 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 32: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.122(a), NSPS Subpart L

Replaced by Condition(s) 1-7

Item 32.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD

Emission Point: 00012

Emission Unit: 1-0LEAD

Emission Point: 00016

Emission Unit: 1-0LEAD

Emission Point: 00017

Regulated Contaminant(s):



CAS No: 0NY075-00-0 PARTICULATES

Item 32.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Revere is prohibited from causing or allowing emissions having an average opacity during any six consecutive minutes of 20 percent or greater from the reverberatory furnace emission source, except only the emission of uncombined water.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 1-10: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 60.122(b), NSPS Subpart L

Replaces Condition(s) 33

Item 1-10.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD

Emission Point: 00002

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-10.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Revere Smelting & Refining is prohibited from causing or allowing emissions having an average opacity during any six consecutive minutes of 10 percent or greater from the



refining kettles, except only the emission of uncombined water. Revere shall continue to operate a Continuous Opacity Monitor associated with EP 00002 to assure compliance. Records shall be maintained by the facility and available for review by the Department upon request.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Reference Test Method: EPA Method 9 / COM

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 33: Compliance Certification

Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.122(b), NSPS Subpart L

Replaced by Condition(s) 1-10

Item 33.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-OLEAD

Emission Point: 00002

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 33.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Revere is prohibited from causing or allowing emissions having an average opacity during any six consecutive minutes of 10 percent or greater from the refining kettles, except only the emission of uncombined water. Revere shall continue to operate a Continuous Opacity Monitor associated with EP 00002 to assure compliance.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.



Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 1-11: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Replaces Condition(s) 36

Item 1-11.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-11.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This condition applies to emission unit 1-0LEAD baghouse control devices identified as 000B1, 000B2 and 000B4 and emission unit 1-SRFKD baghouse control devices identified as 000B3 and SRFBH.

Revere Smelting & Refining is subject to the Recordkeeping and Reporting requirements of 40 CFR 63.10 specific to Continuous Monitoring Systems (CMS) defined as leak detection equipped baghouses. Additional requirements for monitoring and operation of bag leak detection system are defined under 40 CFR 63.548(e).

Pursuant to 40 CFR 63.10(b), Revere Smelting & Refining shall retain 5 years historical record of the following:

1. Occurrence and duration of each startup or shutdown which caused an exceedance of the lead emission limit defined by 40 CFR 63.X;
2. Occurrence and duration of each process, baghouse control and monitoring equipment malfunction;
3. Maintenance performed on the baghouse control and monitoring equipment;
4. Corrective action taken during periods of startup or malfunction which resulted in an exceedance of the lead emission limit;
5. CMS malfunction, out of control periods and



inoperation;

6. Stack test results of lead and particulates including visible evaluations;
7. CMS performance evaluations and calibration checks;
8. Nature and cause of CMS malfunctions;
9. CMS adjustments and maintenance.

Reverse Smelting & Refining is subject to 40 CFR 63.10(e)(3) and shall submit a semi-annual Summary Report entitled Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance which shall contain the following:

1. Company name and address;
2. Hazardous air pollutant monitored;
3. Reporting period;
4. Process unit description;
5. Emission and operating parameter limitations;
6. Monitoring equipment manufacturer and model number;
7. Date of last CMS certification or audit;
8. Affected source operating time during reporting period;
9. An emission data summary;
10. CMS performance summary;
11. Description of change of CMS, process or controls;
12. Responsible official certification.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 36: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Replaced by Condition(s) 1-11

Item 36.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD

Process: FRN

Emission Source: 000B1

Emission Unit: 1-0LEAD

Process: REF

Emission Source: 000B1

Emission Unit: 1-0LEAD

Process: SLG

Emission Source: 000B1



Emission Unit: 1-0LEAD Process: FRN	Emission Source: 000B2
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 000B2
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B2
Emission Unit: 1-0LEAD Process: SLG	Emission Source: 000B2
Emission Unit: 1-0LEAD Process: DRY	Emission Source: 000B3
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B4

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Revere is subject to the Recordkeeping and Reporting requirements of 40 CFR 63.10 specific to Continuous Monitoring Systems defined as leak detection equipped baghouses B1, B2, B3 and B4. Additional requirements for monitoring and operation of bag leak detection system are defined under 40 CFR 63.548(e).

Pursuant to 40 CFR 63.10(b), Revere shall retain 5 years historical record of the following:

1. Occurrence and duration of each startup or shutdown which caused an exceedance of the lead emission limit defined by 40 CFR 63.X;
2. Occurrence and duration of each process, baghouse control and monitoring equipment malfunction;
3. Maintenance performed on the baghouse control and monitoring equipment;
4. Corrective action taken during periods of startup or malfunction which resulted in an exceedance of the lead emission limit;
5. CMS malfunction, out of control periods and inoperation;
6. Stack test results of lead and particulates including visible evaluations;
7. CMS performance evaluations and calibration checks;
8. Nature and cause of CMS malfunctions;
9. CMS adjustments and maintenance.

Revere is subject to 40 CFR 63.10(e)(3) and shall continue to submit a semi-annual Summary Report entitled Gaseous



and Opacity Excess Emission and Continuous Monitoring System Performance which shall contain the following:

1. Company name and address;
2. Hazardous air pollutant monitored;
3. Reporting period;
4. Process unit description;
5. Emission and operating parameter limitations;
6. Monitoring equipment manufacturer and model number;
7. Date of last CMS certification or audit;
8. Affected source operating time during reporting period;
9. An emission data summary;
10. CMS performance summary;
11. Description of change of CMS, process or controls;
12. Responsible official certification.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 1-12: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.543, Subpart X

Replaces Condition(s) 38

Item 1-12.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD

Emission Point: 00017

Regulated Contaminant(s):

CAS No: 007439-92-1 LEAD

Item 1-12.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Lead discharged into the atmosphere from the reverberatory furnace is limited to less than 0.00087 grains of lead per dry standard cubic foot.

This limit also applies to the short rotary furnace (SRF), however, the permit contains a lower limit under 6NYCRR 201-7 in support of verifying emissions are below



significant source thresholds defined under 40CFR 52-A.21.
Therefore, separate permit conditions applicable to the
SRF supersede this requirement.

Except as provided in paragraph (i) below, compliance
testing for lead compounds shall be conducted on an annual
basis but no later than 12 calendar months following the
previous compliance test.

(i) If a compliance test demonstrates a source emitted
lead compounds at 0.00044 grains of lead per dry standard
cubic foot or less during the time of the compliance test,
the owner or operator of a secondary lead smelter shall be
allowed up to 24 calendar months from the previous
compliance test to conduct the next annual compliance test
for lead compounds.

At least 60 days prior to actual testing, Revere Smelting
& Refining shall submit to NYSDEC a test protocol
detailing methods and procedures to be used during the
compliance test. Results must be submitted to NYSDEC
within 60 days after completion of compliance
testing.

Compliance test for emissions of lead shall be conducted
using 40CFR Part 60, Appendix A, Method 12.

Parameter Monitored: LEAD

Upper Permit Limit: 0.00087 grains per dscf

Reference Test Method: Method 12

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 38: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.543, Subpart X

Replaced by Condition(s) 1-12

Item 38.1:

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

Emission Unit: 1-0LEAD

Emission Point: 00017

Regulated Contaminant(s):

CAS No: 007439-92-1 LEAD

Item 38.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Lead discharged into the atmosphere from the reverberatory furnace is limited to less than 0.00087 grains of lead per dry standard cubic foot.

Except as provided in paragraph (i) below, compliance testing for lead compounds shall be conducted on an annual basis (no later than 12 calendar months following the previous compliance test).

(i) If a compliance test demonstrates a source emitted lead compounds at 0.00044 grains of lead per dry standard cubic foot or less during the time of the compliance test, the owner or operator of a secondary lead smelter shall be allowed up to 24 calendar months from the previous compliance test to conduct the next annual compliance test for lead compounds.

At least 60 days prior to actual testing, Revere shall submit to NYSDEC a test protocol detailing methods and procedures to be used during the compliance test. Results must be submitted to NYSDEC within 60 days after completion of compliance testing.

Compliance test for emissions of lead shall be conducted using 40CFR Part 60, Appendix A, Method 12.

Parameter Monitored: LEAD

Upper Permit Limit: 0.00087 grains per dscf

Reference Test Method: Method 12

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-13: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.544, Subpart X

Replaces Condition(s) 39

Item 1-13.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD Emission Point: 00002

Emission Unit: 1-0LEAD Emission Point: 00008

Emission Unit: 1-0LEAD Emission Point: 00009



Emission Unit: 1-0LEAD	Emission Point: 00010
Emission Unit: 1-0LEAD	Emission Point: 00011
Emission Unit: 1-0LEAD	Emission Point: 00012
Emission Unit: 1-0LEAD	Emission Point: 00016
Emission Unit: 1-SRFKD Process: DRY	Emission Point: 00001 Emission Source: 000B3

Regulated Contaminant(s):
CAS No: 007439-92-1 LEAD

Item 1-13.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Process fugitive emission sources shall be equipped with an enclosure hood meeting the face velocity requirements of (b)(1), (b)(2) or (b)(3) of this section or be located in a total enclosure subject to general ventilation that maintains the building at lower than ambient pressure to ensure in-draft through doorway openings.

Revere Smelting & Refining employs both collection strategies. Compliance with total enclosure shall govern and is defined under 40CFR63.547(e)(2).

Lead discharged into the atmosphere from the process fugitive sources is limited to less than 0.00087 grains of lead per dry standard cubic foot.

For clarification, this limit applies to kiln dryer emissions (excluding short rotary furnace emissions) exhausted through emission point 00001.

Except as provided in paragraph (i) below, compliance testing for lead compounds shall be conducted on an annual basis (no later than 12 calendar months following the previous compliance test).

(i) If a compliance test demonstrates a source emitted lead compounds at 1.0 milligram of lead per dry standard cubic meter (0.00044 grains of lead per dry standard cubic foot) or less during the time of the compliance test, the owner or operator of a secondary lead smelter shall be allowed up to 24 calendar months from the previous compliance test to conduct the next annual compliance test for lead compounds.



At least 60 days prior to actual testing, Revere Smelting & Refining shall submit to NYSDEC a test protocol detailing methods and procedures to be used during the compliance test. Results must be submitted to NYSDEC within 60 days after completion of compliance testing.

Compliance test for emissions of lead shall be conducted using 40CFR Part 60, Appendix A, Method 12.

Upper Permit Limit: 0.00087 grains per dscf

Reference Test Method: Method 12

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 39: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63.544, Subpart X

Replaced by Condition(s) 1-13

Item 39.1:

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

Emission Unit: 1-0LEAD	Emission Point: 00002
Emission Unit: 1-0LEAD	Emission Point: 00008
Emission Unit: 1-0LEAD	Emission Point: 00009
Emission Unit: 1-0LEAD	Emission Point: 00010
Emission Unit: 1-0LEAD	Emission Point: 00011
Emission Unit: 1-0LEAD	Emission Point: 00012
Emission Unit: 1-0LEAD	Emission Point: 00016
Emission Unit: 1-0LEAD	Emission Point: 00001

Regulated Contaminant(s):
CAS No: 007439-92-1 LEAD

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Process fugitive emission sources shall be equipped with an enclosure hood meeting the face velocity requirements



of (b)(1), (b)(2) or (b)(3) of this section or be located in a total enclosure subject to general ventilation that maintains the building at lower than ambient pressure to ensure in-draft through doorway openings.

Revere employs both collection strategies. Compliance with total enclosure shall govern and is defined under 40CFR63.547(e)(2).

Lead discharged into the atmosphere from the process fugitive sources is limited to less than 0.00087 grains of lead per dry standard cubic foot.

Except as provided in paragraph (i) below, compliance testing for lead compounds shall be conducted on an annual basis (no later than 12 calendar months following the previous compliance test).

(i) If a compliance test demonstrates a source emitted lead compounds at 1.0 milligram of lead per dry standard cubic meter (0.00044 grains of lead per dry standard cubic foot) or less during the time of the compliance test, the owner or operator of a secondary lead smelter shall be allowed up to 24 calendar months from the previous compliance test to conduct the next annual compliance test for lead compounds.

At least 60 days prior to actual testing, Revere shall submit to NYSDEC a test protocol detailing methods and procedures to be used during the compliance test. Results must be submitted to NYSDEC within 60 days after completion of compliance testing.

Compliance test for emissions of lead shall be conducted using 40CFR Part 60, Appendix A, Method 12.

Upper Permit Limit: 0.00087 grains per dscf

Reference Test Method: Method 12

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-14: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.544(b), Subpart X

Replaces Condition(s) 40

Item 1-14.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:



Emission Unit: 1-0LEAD

Emission Unit: 1-SRFKD

Item 1-14.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Revere Smelting & Refining shall continue to operate general ventilation that maintains the building enclosure at a lower than ambient pressure to ensure in-draft through all doorway openings.

Revere Smelting & Refining is subject to total enclosure requirements under 40CFR63.547(e). To comply, the facility shall continue to utilize a sensor/ magnehelic gauge configuration installed in the rear of the main building proximal to the outside baghouse yard area. The sensor / magnehelic shall be equipped with transmitter and recorder and certified by the manufacturer capable of measuring pressure differential between 0.02 mm Hg (0.01 inches of H₂O) and 0.2 mm Hg (0.11 inches of H₂O).

Historical pressure differential data shall be maintained by the the facility to demonstrate compliance subject to Department review.

Parameter Monitored: PRESSURE

Lower Permit Limit: 0.01 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 40: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63.544(b), Subpart X

Replaced by Condition(s) 1-14

Item 40.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD

Item 40.2:

Compliance Certification shall include the following monitoring:



Emission Unit: 1-0LEAD Process: FRN	Emission Source: 000B2
Emission Unit: 1-SRFKD Process: DRY	Emission Source: 000B3
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B4
Emission Unit: 1-0LEAD Process: FRN	Emission Source: 000B5
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 000B5
Emission Unit: 1-0LEAD Process: FRN	Emission Source: 000B6
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 000B6
Emission Unit: 1-0LEAD Process: FRN	Emission Source: 000B7
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 000B7
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B8
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B9
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 00B10
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 00B12
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 00B13
Emission Unit: 1-0LEAD Process: REF	Emission Source: 00B11
Emission Unit: 1-SRFKD Process: SRF	Emission Source: SRFBH
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 000B2

Item 1-15.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Revere Smelting & Refining shall continue to operate in accordance with the standard operating procedures manual (December 1997 as amended) that describes in detail, procedures for inspection, maintenance, bag leak detection and corrective action plans for all baghouses (fabric filters) that are used to control process, process fugitive or fugitive dust emissions.

Inspection and maintenance shall include, at a minimum, the following:

1. Daily monitoring of pressure drop across each baghouse cell;
2. Weekly confirmation that collected baghouse pollutants are effectively being removed;
3. Daily check of pulse jet baghouse compressed air supply;
4. Monitoring cleaning cycles to ensure proper operation;
5. Monthly check of bag cleaning mechanisms to verify proper function;
6. Quarterly confirmation of baghouse integrity;
7. Continuous operation of bag leak detection (B1, B2, B3, B4 and SRFBH).

Bag leak detection system shall conform with specification and requirements of 40 CFR 548(e)(1) thru (8) as well as corrective action under 40 CFR 548(f).

Revere Smelting & Refining shall maintain an up to date version of the operating procedures manual subject to Department review.

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 42: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.548, Subpart X

Replaced by Condition(s) 1-15

Item 42.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-0LEAD



Process: FRN	Emission Source: 000B1
Emission Unit: 1-0LEAD Process: FRN	Emission Source: 000B2
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 000B2
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B1
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B2
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B4
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B8
Emission Unit: 1-0LEAD Process: REF	Emission Source: 000B9
Emission Unit: 1-0LEAD Process: SLG	Emission Source: 000B1
Emission Unit: 1-0LEAD Process: SLG	Emission Source: 000B2
Emission Unit: 1-0LEAD Process: REF	Emission Source: 00B11
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 00B13
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 00B12
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 00B10
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 000B7
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 000B6
Emission Unit: 1-0LEAD Process: MHS	Emission Source: 000B5
Emission Unit: 1-0LEAD Process: FRN	Emission Source: 000B7



Emission Unit: 1-0LEAD

Process: FRN

Emission Source: 000B6

Emission Unit: 1-0LEAD

Process: FRN

Emission Source: 000B5

Emission Unit: 1-0LEAD

Process: DRY

Emission Source: 000B3

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Revere shall continue to operate in accordance with the standard operating procedures manual (December 1997) that describes in detail, procedures for inspection, maintenance, bag leak detection and corrective action plans for all baghouses (fabric filters) that are used to control process, process fugitive or fugitive dust emissions.

Inspection and maintenance shall include, at a minimum, the following:

1. Daily monitoring of pressure drop across each baghouse cell;
2. Weekly confirmation that collected baghouse pollutants are effectively being removed;
3. Daily check of pulse jet baghouse compressed air supply;
4. Monitoring cleaning cycles to ensure proper operation;
5. Monthly check of bag cleaning mechanisms to verify proper function;
6. Quarterly confirmation of baghouse integrity;
7. Continuous operation of bag leak detection (B1, B2, B3 and B4).

Bag leak detection system shall conform with specification and requirements of 40 CFR 548(e)(1) thru (8) as well as corrective action under 40 CFR 548(f).

Revere shall maintain an up to date version of the operating procedures manual subject to Department review.

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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



**** Emission Unit Level ****

Condition 43: Emission Point Definition By Emission Unit
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-6

Item 43.1(From Mod 1):

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

Emission Unit: 1-0LEAD

Emission Point: 00002

Height (ft.): 100 Diameter (in.): 54
 NYTMN (km.): 4589.939 NYTME (km.): 553.403 Building: MAIN

Emission Point: 00004

Height (ft.): 43 Length (in.): 49 Width (in.): 33
 NYTMN (km.): 4590.145 NYTME (km.): 553.487 Building: MAIN

Emission Point: 00007

Height (ft.): 43 Length (in.): 49 Width (in.): 33
 NYTMN (km.): 4589.99 NYTME (km.): 553.434 Building: MAIN

Emission Point: 00008

Height (ft.): 39 Length (in.): 49 Width (in.): 33
 NYTMN (km.): 4590.125 NYTME (km.): 553.461 Building: MAIN

Emission Point: 00009

Height (ft.): 39 Length (in.): 49 Width (in.): 33
 NYTMN (km.): 4590.125 NYTME (km.): 553.454 Building: MAIN

Emission Point: 00010

Height (ft.): 39 Length (in.): 49 Width (in.): 33
 NYTMN (km.): 4590.126 NYTME (km.): 553.451 Building: MAIN

Emission Point: 00011

Height (ft.): 39 Length (in.): 49 Width (in.): 33
 NYTMN (km.): 4590.126 NYTME (km.): 553.447 Building: MAIN

Emission Point: 00012

Height (ft.): 45 Length (in.): 60 Width (in.): 80
 NYTMN (km.): 4590.066 NYTME (km.): 553.487 Building: MAIN

Emission Point: 00016

Height (ft.): 45 Length (in.): 60 Width (in.): 80
 NYTMN (km.): 4590.068 NYTME (km.): 553.476 Building: MAIN

Emission Point: 00017

Height (ft.): 60 Diameter (in.): 48



NYTMN (km.): 4589.992 NYTME (km.): 553.457 Building: MAIN

Item 43.2(From Mod 1):

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

Emission Unit: 1-SRFKD

Emission Point: 00001

Height (ft.): 200

Diameter (in.): 56

NYTMN (km.): 4590.049 NYTME (km.): 553.486 Building: MAIN

Item 43.3(From Mod 1):

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

Emission Unit: 2-CRYST

Emission Point: 00014

Height (ft.): 38

Diameter (in.): 10

NYTMN (km.): 4590.19 NYTME (km.): 553.512 Building: CRYST

Emission Point: 00024

Height (ft.): 35

Diameter (in.): 10

NYTMN (km.): 4590.18 NYTME (km.): 553.511 Building: CRYST

Item 43.4(From Mod 0):

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

Emission Unit: 3-GENER

Emission Point: 00005

Height (ft.): 13

Diameter (in.): 8

NYTMN (km.): 4590.154 NYTME (km.): 553.423 Building: MAIN

Emission Point: 00006

Height (ft.): 13

Diameter (in.): 8

NYTMN (km.): 4590.148 NYTME (km.): 553.422 Building: MAIN

Item 43.5(From Mod 0):

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

Emission Unit: 4-BOILR

Emission Point: 00015

Height (ft.): 38

Diameter (in.): 20

NYTMN (km.): 4590.197 NYTME (km.): 553.522 Building: CRYST

Condition 44: Process Definition By Emission Unit

Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-6

Item 44.1(From Mod 1):

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



Emission Unit: 1-0LEAD
Process: FRN Source Classification Code: 3-04-004-02
Process Description:
SMELTING OF DRIED LEAD CONTAINING MATERIAL
AND TAPPING FURNACE PRODUCT.

Emission Source/Control: 000B1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000B2 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000B5 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000B6 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000B7 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000S1 - Control
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 000R1 - Process

Emission Source/Control: FLTAP - Process

Emission Source/Control: MOLDS - Process

Emission Source/Control: RFRAM - Process

Item 44.2(From Mod 1):

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

Emission Unit: 1-0LEAD
Process: MHS Source Classification Code: 3-04-004-10
Process Description:
MATERIAL HANDLING AND STORAGE INCLUDES:
YARD BUILDING AREA, FEED ROOM, CENTRAL
VACUUM SYSTEM AND DROSS BIN.

Emission Source/Control: 000B2 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000B5 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000B6 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000B7 - Control



Control Type: FABRIC FILTER

Emission Source/Control: 000S1 - Control
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 00B10 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00B12 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00B13 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0YARD - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0FEED - Process

Emission Source/Control: CVACC - Process

Emission Source/Control: DSBIN - Process

Item 44.3(From Mod 1):

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

Emission Unit: 1-0LEAD
Process: NIT Source Classification Code: 3-04-004-99
Process Description: ADDITION OF NITER IN SUPPORT OF REFINING LEAD.

Emission Source/Control: 000B2 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000K1 - Process

Emission Source/Control: 000K2 - Process

Emission Source/Control: 000K3 - Process

Emission Source/Control: 000K4 - Process

Emission Source/Control: 000K5 - Process

Emission Source/Control: 000K6 - Process

Emission Source/Control: 000K7 - Process

Item 44.4(From Mod 1):

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

Emission Unit: 1-0LEAD
Process: REF Source Classification Code: 3-04-004-14
Process Description:



Emission Source/Control: VSCRB - Control
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: CRCYC - Process

Emission Source/Control: CRDRY - Process

Emission Source/Control: PSPRY - Process

Item 44.9(From Mod 0):

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

Emission Unit: 3-GENER

Process: GEN

Source Classification Code: 2-01-001-02

Process Description:

TWO DIESEL GENERATORS USED TO PROVIDE
SUPPLEMENTAL POWER WHEN REQUESTED BY THE
UTILITY COMPANY, AND DURING POWER OUTAGES.
MAX OPERATING HOURS PER YEAR LESS THAN 500
HOURS/GENERATOR.

Emission Source/Control: GEN05 - Combustion

Design Capacity: 30 million Btu per hour

Emission Source/Control: GEN06 - Combustion

Design Capacity: 30 million Btu per hour

Item 44.10(From Mod 0):

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

Emission Unit: 4-BOILR

Process: BLR

Source Classification Code: 1-02-006-02

Process Description:

NATURAL GAS FIRED BOILER RATED AT 12.55
MMBTU/HR WHICH PROVIDES REQUIRED HEAT FOR
CRYSTALLIZATION PROCESS.

Emission Source/Control: 00B01 - Combustion

Design Capacity: 12.55 million Btu per hour

**Condition 1-16: Emission Unit Permissible Emissions
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-7

Item 1-16.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 1-SRFKD

CAS No: 0NY210000 (From Mod 1)



Name: OXIDES OF NITROGEN

PTE(s): 7.7 pounds per hour

67,452 pounds per year

**Condition 1-17: Process Permissible Emissions
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-7

Item 1-17.1:

The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 1-0LEAD Process: NIT
CAS No: 0NY210-00-0 (From Mod 1)
Name: OXIDES OF NITROGEN
PTE(s): 10.3 pounds per hour
90,480 pounds per year
45.24 tons per year

Emission Unit: 1-0LEAD Process: REF
CAS No: 000630-08-0 (From Mod 1)
Name: CARBON MONOXIDE
PTE(s): 8,241 pounds per year
4.12 tons per year

CAS No: 0NY210-00-0 (From Mod 1)
Name: OXIDES OF NITROGEN
PTE(s): 9,820 pounds per year
4.91 tons per year

Emission Unit: 1-SRFKD Process: DRY
CAS No: 0NY210-00-0 (From Mod 1)
Name: OXIDES OF NITROGEN
PTE(s): 1.2 pounds per hour
10,512 pounds per year

Emission Unit: 1-SRFKD Process: SRF
CAS No: 000630-08-0 (From Mod 1)
Name: CARBON MONOXIDE
PTE(s): 22 pounds per hour
192,720 pounds per year
96.4 tons per year

CAS No: 007439-92-1 (From Mod 1)
Name: LEAD
PTE(s): 0.13 pounds per hour
1,139 pounds per year



0.57 tons per year

CAS No: 007446-09-5 (From Mod 1)

Name: SULFUR DIOXIDE

PTE(s): 8.8 pounds per hour

77,088 pounds per year

38.54 tons per year

CAS No: 0NY075-00-5 (From Mod 1)

Name: PM-10

PTE(s): 3.34 pounds per hour

29,258 pounds per year

14.64 tons per year

CAS No: 0NY210-00-0 (From Mod 1)

Name: OXIDES OF NITROGEN

PTE(s): 6.5 pounds per hour

56,940 pounds per year

28.47 tons per year

CAS No: 0NY998-00-0 (From Mod 1)

Name: VOC

PTE(s): 3.42 pounds per hour

30,000 pounds per year

15 tons per year

Condition 45: Compliance Certification
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.10

Expired by Mod 1

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-0LEAD

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Revere shall limit addition of niter to less than 234 tons to any and all processes over any consecutive 12 month period.

Monitoring Frequency: DAILY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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



**Condition 1-18: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-18.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 231-2

Item 1-18.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-18.3:

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

Item 1-18.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-18.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-18.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-0LEAD

Process: NIT

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 1-18.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Revere Smelting & Refining shall limit sodium nitrate (niter) addition introduced to refining kettles to 145 tons per year or less based on a rolling twelve month cumulative total. This limit is established as a



downstream component of ensuring the short rotary furnace (SRF) project does not exceed significant source nonattainment thresholds defined by 6NYCRR 231-2 and supersedes the previous annual limit of 234 tons per year.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

**Condition 1-19: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-7

Item 1-19.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 231-2
40CFR 52-A.21

Item 1-19.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-19.3:

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

Item 1-19.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-19.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.



Item 1-19.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-0LEAD

Process: REF

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 1-19.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Natural gas combustion used to fire the refinery kettles is limited to 98.13 million cubic feet per year. This limit is established as a downstream component of ensuring the short rotary furnace (SRF) project does not exceed significant source attainment and nonattainment thresholds defined under 40 CFR 52-A.21 and 6NYCRR 231-2 respectively.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NATURAL GAS

Parameter Monitored: NATURAL GAS

Upper Permit Limit: 98.13 million cubic feet per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-20: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 212.9

Item 1-20.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-0LEAD

Emission Point: 00017

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-20.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING



Monitoring Description:

Sulfur dioxide emissions from the reverberatory furnace exiting through Emission Point 00017 shall be controlled at 97%. Compliance testing shall be demonstrated once per permit term.

At least 60 days prior to actual testing, Revere Smelting & Refining shall submit to NYSDEC a test protocol detailing methods and procedures to be used during the compliance test. Results must be submitted to NYSDEC within 60 days after completion of compliance testing.

Compliance test to determine control of sulfur dioxide emissions shall be conducted using 40CFR Part 60, Appendix A, Method 6.

Parameter Monitored: SULFUR DIOXIDE

Lower Permit Limit: 97 percent reduction

Reference Test Method: EPA Method 6

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-21: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 212.10(a)(2)

Item 1-21.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SRFKD

Process: SRF

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 1-21.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Revere Smelting & Refining is an existing major facility based on potential emissions for Oxides of Nitrogen (NO_x) exceeding 100 tons per year. Therefore, Revere Smelting & Refining is subject to NO_x Reasonably Available Control Technology (RACT) specific to General Process Emission Sources under 6NYCRR 212.10.

The proposed SRF shall be equipped with low NO_x burners which fire natural gas. High purity oxygen shall be combined with the natural gas. Replacing substantial



quantity of ambient air (79% nitrogen) with high purity oxygen for combustion, significantly reduces formation of NOx as well as improves efficiency.

Revere Smelting & Refining shall provide written notification prior to conducting future modification to the SRF process equipment.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-22: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-22.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40CFR 52-A.21

Item 1-22.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-22.3:

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

Item 1-22.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-22.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-22.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SRFKD

Emission Point: 00001



Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-22.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

For purposes of confirming the short rotary furnace (SRF) project potential to emit (PTE) emissions of Sulfur Dioxide (SO₂) is less than significant source attainment thresholds of 40 tons per year under 40CFR 52-A.21, Revere Smelting & Refining shall operate a Continuous Monitor System (CMS) to measure SO₂ emissions and flow directly exhausted from the SRF prior to combining with exhaust from kiln dryer.

SO₂ emissions from the SRF exhaust shall not exceed a short term limit of 8.8 lbs/hr and annual limit of 38.54 tons/yr. The short term limit of 8.8 lbs/hr shall be based on a 30 day (month) average. The annual limit of 38.54 tons/yr shall be based on a 12 month average - rolled monthly.

The CMS shall conform with design and performance criteria outlined in 40 CFR 60 Appendix A. The CMS shall be operated in accordance with Quality Assurance Procedures outlined by 40 CFR 60, Appendix F. This includes, but not limited to, implementing a Quality Control Program (40 CFR 60-F.1), quarterly Data Accuracy Assessment (40 CFR 60-F.5) and Reporting Requirements (40 CFR 60-F.7).

Continuous monitors must be operated at all times when the associated process equipment is operating except during any quality assurance and routine maintenance activities.

The CMS shall meet a minimum of 95% actual data availability based on quarterly (calendar) reporting period. At 95% and above availability for the quarterly reporting period, the facility shall substitute the highest recorded hourly value from previous 24 hour period for each missing data period. At less than 95% availability for the quarterly reporting period, the facility shall substitute the highest hourly value recorded during the quarter for each missing data period.

In support of documenting compliance, Revere Smelting & Refining shall submit a Continuous Monitoring System summary report. The summary report shall be submitted



quarterly (calendar) and contain the following information:

1. Daily tabulation of actual continuous monitor system (CMS) operation time;
2. Daily tabulation of CMS downtime;
3. Summary outlining cause of CMS downtime;
4. Data substitution procedure for the reporting period;
4. Daily tabulation of measured SO₂ emissions in terms of ppm and lbs/hr;
5. Monthly average SO₂ emissions in lbs/hr;
6. Rolling annual cumulative total SO₂ emissions in tons/yr;
7. Identification of any exceedances of SO₂ limits and description of corrective action; and
8. Information on any changes to process equipment, control or CMS components.

Manufacturer Name/Model Number: CMS

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 8.8 pounds per hour

Reference Test Method: CEM

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING

DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 3 calendar month(s).

**Condition 1-23: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-23.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 231-2

Item 1-23.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-23.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating



hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 1-23.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-23.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-23.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SRFKD Emission Point: 00001

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 1-23.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

For purposes of confirming the short rotary furnace (SRF) project potential to emit (PTE) emissions of NO_x is less than significant source nonattainment thresholds of 40 tons per year under 6NYCRR 231-2, Revere Smelting & Refining shall operate a Continuous Monitor System (CMS) to measure NO_x emissions from the combined rotary kiln and SRF.

NO_x emissions from the combined kiln dryer and SRF exhaust shall not exceed a short term limit of 7.7 lbs/hr and annual limit of 33.73 tons/yr. The short term limit of 7.7 lbs/hr shall be based on a 30 day (month) average. The annual limit of 33.73 tons/yr shall be based on a 12 month average - rolled monthly.

Actual emissions attributable to the SRF shall be calculated by subtracting kiln dryer baseline emissions of 1.2 lbs/hr. In the event the SRF is operated independent of the kiln dryer, the NO_x short term limit shall be 6.5 lbs/hr averaged over each 24 hour block period.

The CMS shall conform with design and performance criteria outlined in 40 CFR 60 Appendix A. The CMS shall be operated in accordance with Quality Assurance Procedures outlined by 40 CFR 60, Appendix F. This includes, but not



limited to, implementing a Quality Control Program (40 CFR 60-F.1), quarterly Data Accuracy Assessment (40 CFR 60-F.5) and Reporting Requirements (40 CFR 60-F.7).

Continuous monitors must be operated at all times when the associated process equipment is operating except during any quality assurance and routine maintenance activities.

The CMS shall meet a minimum of 95% actual data availability based on quarterly (calendar) reporting period. At 95% and above availability for the quarterly reporting period, the facility shall substitute the highest recorded hourly value from previous 24 hour period for each missing data period. At less than 95% availability for the quarterly reporting period, the facility shall substitute the highest hourly value recorded during the quarter for each missing data period.

In support of documenting compliance, Revere Smelting & Refining shall submit a Continuous Monitoring System summary report. The summary report shall be submitted quarterly (calendar) and contain the following information:

1. Daily tabulation of actual continuous monitor system (CMS) operation time;
2. Daily tabulation of CMS downtime;
3. Summary outlining cause of CMS downtime;
4. Data substitution procedure for the reporting period;
4. Daily tabulation of measured NO_x emissions in terms of ppm and lbs/hr;
5. Monthly average NO_x emissions in lbs/hr;
6. Rolling annual cumulative total NO_x emissions in tons/yr;
7. Identification of any exceedances of NO_x and description of corrective action; and
8. Information on any changes to process equipment, control or CMS components.

Manufacturer Name/Model Number: CMS

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 7.7 pounds per hour

Reference Test Method: CEM

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION



Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 3 calendar month(s).

Condition 1-24: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.9

Item 1-24.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SRFKD Emission Point: 00001

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Sulfur Dioxide emissions discharged into the atmosphere from the combined short rotary furnace (SRF) and kiln dryer shall be controlled at a minimum of 94%. This control efficiency is based on degree of air cleaning required for emission rate potential between 100 and 500 pounds per hour.

Within 60 days after achieving the maximum production rate of the SRF, but no later than 180 days after initial startup as defined in 40 CFR Part 60.2, Revere Smelting & Refining shall conduct an initial performance tests to confirm sulfur dioxide control efficiency. All performance tests shall be conducted at the maximum design operating capacity of the unit(s) being tested and/or other loads specified by NYSDEC and or EPA.

At least 60 days prior to actual testing, the facility shall submit to the NYSDEC and EPA a Test Protocol detailing methods and procedures to be used during the performance stack testing.

Performance tests to determine the stack gas velocity, sample area, volumetric flowrate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40CFR Part 60, Appendix A, Methods 1,2 3, and 4.

Performance test results must be reported to NYSDEC and EPA within 60 days after completion of compliance testing.



Compliance test for sulfur dioxide shall be conducted using 40CFR Part 60, Appendix A, Method 6.

Parameter Monitored: SULFUR DIOXIDE
Lower Permit Limit: 94 percent reduction
Reference Test Method: EPA Method 6
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-25: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-25.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40CFR 52-A.21

Item 1-25.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-25.3:

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

Item 1-25.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-25.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-25.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SRFKD Emission Point: 00001
Process: SRF

Regulated Contaminant(s):
CAS No: 007439-92-1 LEAD



Item 1-25.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Lead discharged into the atmosphere from the exclusive operation of the short rotary furnace (SRF) is limited to less than 0.00026 grains of lead per dry standard cubic foot.

Within 60 days after achieving the maximum production rate of the SRF, but no later than 180 days after initial startup as defined in 40 CFR Part 60.2, Revere Smelting & Refining shall conduct an initial performance tests for Lead emissions. All performance tests shall be conducted at the maximum design operating capacity of the unit(s) being tested and/or other loads specified by NYSDEC and or EPA.

At least 60 days prior to actual testing, the facility shall submit to the NYSDEC and EPA a Test Protocol detailing methods and procedures to be used during the performance stack testing.

Performance tests to determine the stack gas velocity, sample area, volumetric flowrate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40CFR Part 60, Appendix A, Methods 1,2 3, and 4.

Performance test results must be reported to NYSDEC and EPA within 60 days after completion of compliance testing.

Except as provided in paragraph (i) below, compliance testing for lead compounds shall be conducted on an annual basis (no later than 12 calendar months following the previous compliance test).

(i) If a compliance test demonstrates a source emitted lead compounds at 0.00019 grains of lead per dry standard cubic foot or less during the time of the compliance test, the owner or operator of a secondary lead smelter shall be allowed up to 24 calendar months from the previous compliance test to conduct the next annual compliance test for lead compounds.

Compliance test for emissions of lead shall be conducted using 40CFR Part 60, Appendix A, Method 12.

The following requirements are for the sole purpose of



confirming the exclusive operation of the SRF potential to emit (PTE) emissions of Lead is less than 0.13 lbs/hr and 0.57 tons per year. Compliance with this limit is necessary to assure that initial and future SRF emissions are below 40CFR 52-A.21 significant net increase threshold of 0.6 tons per year.

The facility shall determine lead PTE emissions (lbs/hr) for the SRF based on initial and subsequent performance testing. The requirements and frequency of performance testing are outlined above. Reporting to document compliance with limits expressed as 0.13 lbs/hr and 0.57 tons per year shall indicate measured mass per unit volume from most recent performance testing converted to mass per unit time as well as corresponding measured average flow rate. The averaged flow rate over method test runs shall be determined and become the enforceable baseline for determining initial and future compliance.

In the event that future SRF project lead emissions exceed the short term limit of 0.13 lbs/hr, Revere Smelting & Refining shall initiate an immediate evaluation of historical emissions dating back to the most recent compliant performance test. The evaluation shall compare actual emissions to significant net increase thresholds. Revere Smelting & Refining shall submit a findings report to NYSDEC and USEPA within 60 days of conducting the elevated emissions performance test which identifies regulatory compliance status and any corrective action implemented by the facility (e.g. flow adjustments, source curtailment).

If the evaluation affirms emissions exceed significant net increase thresholds, Revere Smelting & Refining will be subject to enforcement for failure to comply with the Prevention of Significant Deterioration of Air Quality (PSD) regulations codified under 40 CFR Part 52.21 for the period spanning the most recent compliance determination. In this case, the facility shall submit, within 90 days of conducting the elevated emissions performance test, a PSD permit application to the NYSDEC and USEPA that complies with all the applicable requirements such as BACT, air quality analysis, etc.

Parameter Monitored: LEAD

Upper Permit Limit: 0.00026 grains per dscf

Reference Test Method: EPA Method 12

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-26: Capping Monitoring Condition



Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-26.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40CFR 52-A.21

Item 1-26.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-26.3:

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

Item 1-26.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-26.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-26.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SRFKD Emission Point: 00001
Process: SRF

Regulated Contaminant(s):
CAS No: 0NY075-00-5 PM-10

Item 1-26.7:

Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Particulate Matter less than 10 microns (PM-10)
discharged into the atmosphere from the exclusive operation
of the short rotary furnace (SRF) is limited to less than
3.34 lbs/hr.



Within 60 days after achieving the maximum production rate of the SRF, but no later than 180 days after initial startup as defined in 40 CFR Part 60.2, Revere Smelting & Refining shall conduct an initial performance tests for PM-10 emissions. All performance tests shall be conducted at the maximum design operating capacity of the unit(s) being tested and/or other loads specified by NYSDEC and or EPA.

At least 60 days prior to actual testing, the facility shall submit to the NYSDEC a Test Protocol detailing methods and procedures to be used during the performance stack testing.

Performance tests to determine the stack gas velocity, sample area, volumetric flowrate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40CFR Part 60, Appendix A, Methods 1,2 3, and 4.

Performance test results must be reported to NYSDEC within 60 days after completion of compliance testing.

Compliance testing for PM-10 emissions shall be conducted on an annual basis (seperated by no more than 12 calendar months previous compliance test).

Emissions of PM-10 shall be the sum of Filterable PM-10 and Condensable Particulate matter results from compliance testing conducted using 40CFR Part 51, Appendix M, Methods 201 or 201A and 202, respectively.

The following requirements are for the sole purpose of confirming the exclusive operation of the SRF potential to emit (PTE) PM-10 emissions is less than 3.34 lbs/hr and 14.64 tons per year. Compliance with this limit is necessary to assure that initial and future SRF emissions are below NYSDEC policy for Assessing and Mitigating Impacts of Fine Particulate Matter Emissions as well Prevention of Significant Detoriation thresholds codified 40CFR 52-A.21.

The facility shall determine PM-10 emissions (lbs/hr) for the exclusive operation of the SRF based on initial and subsequent performance testing. Reporting to document compliance with limits expressed as 3.34 lbs/hr and 14.64 tons per year shall indicate measured mass per unit volume from most recent performance testing as well as corresponding measured average flow rate. The averaged flow rate over method test runs shall be determined and become the enforceable baseline for determining initial and future compliance.



In the event that future SRF project PM-10 emissions exceed the short term limit of 3.34 lbs/hr, Revere Smelting & Refining shall initiate an immediate evaluation of historical emissions dating back to the most recent compliant performance test. The evaluation shall compare actual emissions to significant net increase thresholds (15 tons per year). Revere Smelting & Refining shall submit a findings report to NYSDEC and USEPA within 60 days of conducting the elevated emissions performance test which identifies regulatory compliance status and any corrective action implemented by the facility (e.g. flow adjustments, source curtailment).

If the evaluation affirms emissions exceed significant net increase thresholds, Revere Smelting & Refining will be subject to enforcement for failure to comply with the nonattainment and or attainment New Source Review regulations for the period spanning the most recent compliance determination. In this case, the facility shall submit, within 180 days of conducting the elevated emissions performance test, a permit application to the NYSDEC and USEPA that complies with all the applicable requirements.

Parameter Monitored: PM-10

Upper Permit Limit: 3.34 pounds per hour

Reference Test Method: EPA Method 201 or 201A and 202

Monitoring Frequency: ANNUALLY

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-27: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-7

Item 1-27.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 231-2

Item 1-27.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-27.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of



five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 1-27.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-27.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-27.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SRFKD Emission Point: 00001
Process: SRF

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

Item 1-27.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

 Volatile Organic Compound discharged into the atmosphere from the short rotary furnace (SRF) is limited to less than 3.42 lbs per hour.

 Within 60 days after achieving the maximum production rate of the SRF, but no later than 180 days after initial startup as defined in 40 CFR Part 60.2, Revere Smelting & Refining shall conduct an initial performance tests for Lead emissions. All performance tests shall be conducted at the maximum design operating capacity of the unit(s) being tested and/or other loads specified by NYSDEC and or EPA.

 At least 60 days prior to actual testing, the facility shall submit to the NYSDEC and EPA a Test Protocol detailing methods and procedures to be used during the performance stack testing.

 Performance tests to determine the stack gas velocity, sample area, volumetric flowrate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40CFR Part 60, Appendix A,



Methods 1,2 3, and 4.

Performance test results must be reported to NYSDEC and EPA within 60 days after completion of compliance testing.

Compliance testing for Volatile Organic Compounds shall be conducted initially. Subsequent testing shall be performed following future Title V permit renewal.

Compliance test for emissions of Volatile Organic Compounds shall be conducted using 40CFR Part 60, Appendix A, Method 25A.

The following requirements are for the sole purpose of confirming the exclusive operation of the SRF potential to emit (PTE) emissions of Volatile Organic Compounds is less than 3.42 lbs/hr and 15 tons per year. Compliance with this limit is necessary to assure that initial and future SRF emissions are below 6NYCRR 231-2 significant net increase threshold of 40 tons per year.

The facility shall determine Volatile Organic Compounds PTE emissions (lbs/hr) for the SRF based on initial and subsequent performance testing. Reporting to document compliance with limits expressed as 3.42 lbs/hr and 15.0 tons per year shall indicate measured mass per unit volume from most recent performance testing as well as corresponding measured average flow rate. The averaged flow rate over method test runs shall be determined and become the enforceable baseline for determining initial and future compliance.

Parameter Monitored: VOC

Upper Permit Limit: 3.42 pounds per hour

Reference Test Method: EPA Method 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-28: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-7

Item 1-28.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:



40CFR 52-A.21

Item 1-28.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-28.3:

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

Item 1-28.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-28.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-28.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SRFKD Emission Point: 00001
Process: SRF

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 1-28.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Carbon Monoxide discharged into the atmosphere from the exclusive operation of the short rotary furnace (SRF) is limited to less than 22.0 lbs/hr.

Within 60 days after achieving the maximum production rate of the SRF, but no later than 180 days after initial startup as defined in 40 CFR Part 60.2, Revere Smelting & Refining shall conduct an initial performance tests for Carbon Monoxide emissions. All performance tests shall be conducted at the maximum design operating capacity of the unit(s) being tested and/or other loads specified by NYSDEC and or EPA.

At least 60 days prior to actual testing, the facility



shall submit to the NYSDEC and EPA a Quality Assurance Project Plan detailing methods and procedures to be used during the performance stack testing.

Performance tests to determine the stack gas velocity, sample area, volumetric flowrate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40CFR Part 60, Appendix A, Methods 1,2 3, and 4.

Performance test results must be reported to NYSDEC within 60 days after completion of compliance testing.

Compliance testing for Carbon Monoxide emissions shall be conducted on an annual basis (seperated by no more than 12 calendar months previous compliance test).

Compliance test for emissions of Carbon Monoxide shall be conducted using 40CFR Part 60, Appendix A, Method 10.

The following requirements are for the sole purpose of confirming the exclusive operation of the SRF potential to emit (PTE) emissions of Carbon Monoxide is less than 22.0 lbs/hr and 96.4 tons per year. Compliance with this limit is necessary to assure that initial and future SRF emissions are less than significant source attainment thresholds of 100 tons per year under 40CFR 52-A.21.

The facility shall determine Carbon Monoxide emissions (lbs/hr) for the exclusive operation of the SRF based on initial and subsequent performance testing. Reporting to document compliance with limits expressed as 22.0 lbs/hr and 96.4 tons per year shall indicate measured mass per unit volume from most recent performance testing as well as corresponding measured average flow rate. The averaged flow rate over method test runs shall be determined and become the enforceable baseline for determining initial and future compliance.

In the event that future SRF project Carbon Monoxide emissions exceed the short term limit of 22.0 lbs/hr, Revere Smelting & Refining shall initiate an immediate evaluation of historical emissions dating back to the most recent compliant performance test. The evaluation shall compare actual emissions to significant net increase thresholds (100 tons per year). Revere Smelting & Refining shall submit a findings report to NYSDEC and USEPA within 60 days of conducting the elevated emissions performance test which identifies regulatory compliance status and any corrective action implemented by the



facility (e.g. flow adjustments, source curtailment).

If the evaluation affirms emissions exceed significant net increase thresholds, Revere Smelting & Refining will be subject to enforcement for failure to comply with the Prevention of Significant Deterioration of Air Quality (PSD) regulations codified under 40 CFR Part 52.21 for the period spanning the most recent compliance determination. In this case, the facility shall submit, within 180 days of conducting the elevated emissions performance test, a PSD permit application to the NYSDEC and USEPA that complies with all the applicable requirements such as BACT, air quality analysis, etc.

Parameter Monitored: CARBON MONOXIDE

Upper Permit Limit: 22.0 pounds per hour

Reference Test Method: EPA Method 10

Monitoring Frequency: ANNUALLY

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



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: 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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 47: Contaminant List
Effective between the dates of 11/15/2007 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 47.1:

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

CAS No: 000630-08-0
Name: CARBON MONOXIDE

CAS No: 007439-92-1



Name: LEAD

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY075-00-5

Name: PM-10

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 0NY998-00-0

Name: VOC

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

**Condition 1-29: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement: 6NYCRR 212.9(a)

Item 1-29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-0LEAD

Emission Point: 00017

Item 1-29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Arsenic emissions from the existing reverberatory furnace is limited to less than 0.0033 pounds per hour.

Within 60 days after the maximum production rate of the SRF is achieved, but no later than 180 days after initial SRF startup as defined in 40 CFR Part 60.2, Reverse Smelting & Refining shall conduct an initial performance tests for arsenic emissions. All performance tests shall be conducted at the maximum design operating capacity of the unit(s) being tested and/or other loads specified by NYSDEC and or EPA.

At least 60 days prior to actual testing, the facility shall submit to the NYSDEC a Test Protocol detailing methods and procedures to be used during the performance stack testing.



Performance tests to determine the stack gas velocity, sample area, volumetric flowrate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40CFR Part 60, Appendix A, Methods 1,2 3, and 4.

Compliance test for arsenic emissions shall be conducted using 40CFR Part 60, Appendix A, Method 29. Performance test results must be reported to NYSDEC within 60 days after completion of compliance testing. The test report shall also contain metals emissions obtained from Method 29 procedure including antimony, cadmium, chromium, manganese and nickel.

The limit defined in this condition is based on refined air dispersion modeling. An exceedance of the upper limit will require Revere Smelting & Refining to reevaluate the air dispersion modeling and conduct an impact assessment.

Parameter Monitored: ARSENIC (AS 073)

Upper Permit Limit: 0.0033 pounds per hour

Reference Test Method: EPA Method 29

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-30: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6NYCRR 212.9(a)

Item 1-30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SRFKD

Emission Point: 00001

Item 1-30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Cadmium emissions from the combined short rotary furnace (SRF) and dryer kiln are limited to less than 0.0012 pounds per hour.

Within 60 days after achieving the maximum production rate of the SRF, but no later than 180 days after initial startup as defined in 40 CFR Part 60.2, Revere Smelting & Refining shall conduct an initial performance tests for



cadmium emissions. All performance tests shall be conducted at the maximum design operating capacity of the unit(s) being tested and/or other loads specified by NYSDEC and or EPA.

At least 60 days prior to actual testing, the facility shall submit to the NYSDEC a Test Protocol detailing methods and procedures to be used during the performance stack testing.

Performance tests to determine the stack gas velocity, sample area, volumetric flowrate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40CFR Part 60, Appendix A, Methods 1,2 3, and 4.

Compliance test for cadmium emissions shall be conducted using 40CFR Part 60, Appendix A, Method 29. Performance test results must be reported to NYSDEC within 60 days after completion of compliance testing. The test report shall also contain metals emissions obtained from Method 29 procedure including antimony, arsenic (seperate permit limit), chromium, manganese and nickel.

The limit defined in this condition is based on refined air dispersion modeling. An exceedance of the upper limit will require Revere Smelting & Refining to reevaluate the air dispersion modeling and conduct an impact assessment.

Parameter Monitored: CADMIUM

Upper Permit Limit: 0.0012 pounds per hour

Reference Test Method: EPA Method 29

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-31: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6NYCRR 212.9(a)

Item 1-31.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SRFKD

Emission Point: 00001

Item 1-31.2:

Compliance Demonstration shall include the following monitoring:



Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Arsenic emissions from the combined short rotary furnace (SRF) and dryer kiln are limited to less than 0.0014 pounds per hour.

Within 60 days after achieving the maximum production rate of the SRF, but no later than 180 days after initial startup as defined in 40 CFR Part 60.2, Revere Smelting & Refining shall conduct an initial performance tests for arsenic emissions. All performance tests shall be conducted at the maximum design operating capacity of the unit(s) being tested and/or other loads specified by NYSDEC and or EPA.

At least 60 days prior to actual testing, the facility shall submit to the NYSDEC a Test Protocol detailing methods and procedures to be used during the performance stack testing.

Performance tests to determine the stack gas velocity, sample area, volumetric flowrate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40CFR Part 60, Appendix A, Methods 1,2 3, and 4.

Compliance test for arsenic emissions shall be conducted using 40CFR Part 60, Appendix A, Method 29. Performance test results must be reported to NYSDEC within 60 days after completion of compliance testing. The test report shall also contain metals emissions obtained from Method 29 procedure including antimony, cadmium (seperate permit limit), chromium, manganese and nickel.

The limit defined in this condition is based on refined air dispersion modeling. An exceedance of the upper limit will require Revere Smelting & Refining to reevaluate the air dispersion modeling and conduct an impact assessment.

Parameter Monitored: ARSENIC (AS 073)

Upper Permit Limit: 0.0014 pounds per hour

Reference Test Method: EPA Method 29

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST



METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

New York State Department of Environmental Conservation

Permit ID: 3-3352-00145/00049

Facility DEC ID: 3335200145

