



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3352-00145/00062
Effective Date: 06/19/2014 Expiration Date: 06/18/2024

Permit Issued To: REVERE SMELTING & REFINING CORP
2777 STEMMONS FWY STE 1800
DALLAS, TX 75207

Contact: GERARD MANLEY
ECO-BAT NEW YORK LLC
2777 STEMMONS FREEWAY
DALLAS, TX 75207
(214) 583-0232

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

Contact: RALPH DEVITO
65 BALLARD RD
MIDDLETOWN, NY 10941
(845) 692-4414

Description:

Air State Facility Permit

Revere Smelting & Refining Corporation (Revere) operates a secondary lead smelter located in the Town of Wallkill, Orange County, New York. The purpose of this State Facility Permit is for the construction and operation of a Wet Electrostatic Precipitator (WESP). The WESP consists of seven independently operated units functioning as backend controls of process emissions from the existing feed drying, smelting, slag processing and refining operations. These operations are currently permitted under the Title Permit Renewal 2. Specific changes include redirecting all emissions exhausted through existing points EP00001, EP00002 and EP00017 to the WESP. A one megawatt generator will be used to provide emergency electrical power to the WESP during periods of utility service disruption.

The WESP is projected to significantly reduce numerous pollutant emissions including lead, particulate, and sulfur dioxide. A summary of the permit requirements include:

- The installation and operation of continuous emissions monitoring systems (CEMS) for sulfur dioxide (SO₂) and oxides of nitrogen (NO_x).
- Establishing proper operating ranges of scrubber recirculation flow, ph range and electrostatic pressure differential.
- Performance testing to determine compliance with lead emission limits.



- The purchase and operation of a stationary spark ignited internal combustion engine compliant with the voluntary manufacturer certification program.

All monitoring, recordkeeping and reporting requirements defined under the current Title V permit renewal 2 shall remain in effect throughout the period of construction and initial operation of the WESP. Any changes to the format and content of the Title V permit to include the WESP project will be defined by the future permit modification in accordance with 6NYCRR 201-6.2(a)(3). The modified Title V permit is required within one year after commencing operation of the WESP.

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: JAMES J ELDRED
21 S 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
- Permit modifications, suspensions or revocations by the Department

Facility Level

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



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054

New York State Department of Environmental Conservation

Permit ID: 3-3352-00145/00062

Facility DEC ID: 3335200145



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: REVERE SMELTING & REFINING CORP
2777 STEMMONS FWY STE 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: 06/19/2014

Permit Expiration Date: 06/18/2024



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

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- 2 6 NYCRR 200.7: Compliance Demonstration
- 3 6 NYCRR 201-6.4: Compliance Demonstration
- 4 6 NYCRR 211.1: Air pollution prohibited
- 5 6 NYCRR 212.6 (a): Compliance Demonstration
- 6 6 NYCRR 212.11 (b) (5): Compliance Demonstration
- 7 6 NYCRR 227-1.3 (a): Compliance Demonstration
- 8 40CFR 60, NSPS Subpart JJJJ: Applicability
- 9 40CFR 60, NSPS Subpart JJJJ: Compliance and Enforcement
- 10 40CFR 60, NSPS Subpart JJJJ: Compliance Demonstration
- 11 40CFR 60.4245(a), NSPS Subpart JJJJ: Compliance Demonstration
- 12 40CFR 60.4246, NSPS Subpart JJJJ: Subpart A provisions that apply to facilities subject to Subpart JJJJ
- 13 40CFR 63.543, Subpart X: Compliance Demonstration
- 14 40CFR 63.543, Subpart X: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

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- 15 ECL 19-0301: Contaminant List
- 16 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 17 6 NYCRR Subpart 201-5: Emission Unit Definition
- 18 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 19 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 20 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 21 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 22 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

- Item K: Open Fires Prohibitions - 6 NYCRR 215.2**
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.
- Item L: Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.
- Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Maintenance of Equipment



Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:6 NYCRR 200.7

Item 1.1:

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

Condition 2: Compliance Demonstration

Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:6 NYCRR 200.7

Item 2.1:

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

Emission Unit: 1-1WESP

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operating parameters of the WESP will be finalized at the completion of the initial shakedown and on line testing period. This includes but not limited to establishing appropriate scrubber Ph ranges, scrubber recirculation rates and electrostatic voltage differentials. These parameters, once established, will be itemized as monitoring conditions as appropriate within the Title V Renewal 2 Modification 1 permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 45 days after the reporting period.

The initial report is due 2/14/2015.

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

Condition 3: Compliance Demonstration

Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:6 NYCRR 201-6.4

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

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Permit ID: 3-3352-00145/00062

Facility DEC ID: 3335200145



Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All monitoring, recordkeeping and reporting requirements defined under the current Title V permit renewal 2 shall remain in effect throughout the period of construction and initial operation of the WESP. Any changes to the format and content of the Title V permit to include the WESP project will be defined by the future permit modification in accordance with 6NYCRR 201-6.2(a)(3).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 45 days after the reporting period.

The initial report is due 2/14/2015.

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

Condition 4: Air pollution prohibited
Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:6 NYCRR 211.1

Item 4.1:

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

Condition 5: Compliance Demonstration
Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 5.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-1WESP

Emission Point: 00026

Process: WSP

Emission Source: CWESP

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 5.2:

Compliance Demonstration shall include the following monitoring:

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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 based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

This opacity limit is applicable to the combined flow exhausted through the WESP EP 00026 and is based on the lower value published in 40 CFR 60 Subpart L.

Revere shall perform a method observation within 45 days from initial start-up. The Department reserves the right to perform or require the performance of future Method 9 opacity evaluations 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 45 days after the reporting period.

The initial report is due 2/14/2015.

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

Condition 6: Compliance Demonstration
Effective between the dates of 06/19/2014 and 06/18/2024

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

Item 6.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-1WESP

Process: WSP

Emission Point: 00026

Emission Source: CWESP

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Revere Smelting & Refining Corporation shall certify NOx



and SO2 Continuous Emissions Monitoring Systems (CEMS) for the WESP stack subject to the provisions of 40 CFR, Part 60. Until such time as the WESP NOx and SO2 CEMS are certified, Revere Smelting & Refining Corporation will maintain CEMS upstream of the WESP to maintain compliance with current NOx and SO2 monitoring requirements for the Kiln Dryer, Reverberatory Furnace and Short Rotary Furnace (SRF).

Once the WESP CEMS is certified, Revere Smelting & Refining Corporation will continue to maintain NOx and SO2 CEMS for the SRF to demonstrate compliance with the SRF-only annual emission caps. Decommissioning of the existing CEMS for the Reverberatory Furnace and kiln Dryer shall be evaluated under the future Title V permit modification.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 45 days after the reporting period.
The initial report is due 8/14/2014.
Subsequent reports are due every 3 calendar month(s).

Condition 7: Compliance Demonstration
Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)

Item 7.1:

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

Emission Unit: 1-GENWP	Emission Point: 00027
Process: WSG	Emission Source: GENWP

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any

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Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:40CFR 60, NSPS Subpart JJJJ

Item 10.1:

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

Emission Unit: 1-GENWP
Process: WSG

Emission Point: 00027
Emission Source: GENWP

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Revere shall purchase and operate a stationary SI internal combustion engine under the voluntary manufacturer certification program which certifies to the emissions standards in Table 1 to this subpart.

In accordance with 60.4243(a)(1), Revere shall operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions and keep records of maintenance completed to demonstrate compliance. Performance testing is not required. Revere must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as applicable.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 45 days after the reporting period.

The initial report is due 2/14/2015.

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

Condition 11: Compliance Demonstration

Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:40CFR 60.4245(a), NSPS Subpart JJJJ

Item 11.1:

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

Emission Unit: 1-GENWP
Process: WSG

Emission Point: 00027
Emission Source: GENWP

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators of stationary SI ICE that are subject to the provisions of 40 CFR Subpart JJJJ must meet the following notification, reporting and recordkeeping requirements.

- (1) All notifications submitted to comply with this subpart and all documentation supporting any notification.
- (2) Maintenance conducted on the engine.
- (3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable
- (4) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Subpart A provisions that apply to facilities subject to Subpart JJJJ
Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:40CFR 60.4246, NSPS Subpart JJJJ

Item 12.1:

This Condition applies to:

Emission Unit: 1GENWP Emission Point: 00027
Process: WSG Emission Source: GENWP

Item 12.2:

The following provisions of 40 CFR 60 Subpart A apply to this facility: 60.1 through 60.12, 60.14 through 60.17 and 60.19.

Condition 13: Compliance Demonstration
Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:40CFR 63.543, Subpart X

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Item 13.1:

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

Emission Unit: 1-1WESP Emission Point: 00026

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

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This requirement applies to the WESP and all sources identified in permit renewal 2, condition 38.

The flow-weighted average concentration of lead discharged into the atmosphere from all process vents is limited to 0.20 milligrams or less per dry standard cubic meter. The flow weighted average shall be calculated using equation 1 under 40CFR 63.543(a)(3) and based on a 12-month rolling average.

Parameter Monitored: LEAD

Upper Permit Limit: 0.20 milligrams per dry standard cubic meter

Reference Test Method: Method 29 or CARB Method 436

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 45 days after the reporting period.

The initial report is due 2/14/2015.

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

Condition 14: Compliance Demonstration

Effective between the dates of 06/19/2014 and 06/18/2024

Applicable Federal Requirement:40CFR 63.543, Subpart X

Item 14.1:

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

Emission Unit: 1-1WESP Emission Point: 00026
Process: WSP Emission Source: CWESP

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



Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Lead discharged into the atmosphere from the WESP process vent is limited to less than 1.0 milligrams per dry standard cubic meter.

Following an initial compliance demonstration test, Revere must conduct performance tests annually no later than 12 calendar months following the previous compliance test, unless Revere installs and operates a CEMS meeting the requirements of 40CFR 63.8.

If an annual compliance test demonstrates that a process vent emitted lead compounds at 0.10 milligram of lead per dry standard cubic meter or less, Revere may submit a written request to the USEPA applying for an extension of up to 24 calendar months from the previous compliance test to conduct the next compliance test for lead compounds.

Revere shall conduct the performance tests under maximum representative operating conditions for the process. During the performance test, Revere may operate the control device at maximum or minimum representative operating conditions for monitored control device parameters, whichever results in lower emission reduction. Upon request, Revere must make available to the USEPA records as may be necessary to determine the conditions of performance tests.

At least 60 days prior to actual testing, Revere Smelting & Refining shall submit to NYSDEC and USEPA a test protocol detailing methods and procedures to be used during the compliance test.

EPA Method 1 at 40 CFR part 60, appendix A-1 to select the sampling port location and the number of traverse points.

EPA Method 2 at 40 CFR part 60, appendix A-1 or EPA Method 5D at 40 CFR part 60, appendix A-3, section 8.3 for positive pressure fabric filters, to measure volumetric flow rate.

EPA Method 3, 3A, or 3B at 40 CFR part 60, appendix A-2 to determine the dry molecular weight of the stack gas.

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EPA Method 4 at 40 CFR part 60, appendix A-3 to determine moisture content of the stack gas.

EPA Method 12 or Method 29 at 40 CFR part 60, appendix A-8 to determine compliance with the lead compound emissions standards. The minimum sample volume must be 2.0 dry standard cubic meters (70 dry standard cubic feet) for each run. The average of three test runs are required.

Results must be submitted to NYSDEC and USEPA within 60 days after completion of compliance testing.

Parameter Monitored: LEAD

Upper Permit Limit: 1.0 milligrams per dry standard cubic meter

Reference Test Method: Method 29 or CARB method 436

Monitoring Frequency: ANNUALLY

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 45 days after the reporting period.

The initial report is due 2/14/2015.

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



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 15: Contaminant List
Effective between the dates of 06/19/2014 and 06/18/2024



Applicable State Requirement:ECL 19-0301

Item 15.1:

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

CAS No: 007439-92-1
Name: LEAD

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

**Condition 16: Malfunctions and start-up/shutdown activities
Effective between the dates of 06/19/2014 and 06/18/2024**

Applicable State Requirement:6 NYCRR 201-1.4

Item 16.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that



such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 17: Emission Unit Definition
Effective between the dates of 06/19/2014 and 06/18/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1:

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

Emission Unit: 1-1WESP

Emission Unit Description:

This emission unit defines the operation of seven upflow Wet Electrostatic Precipitator (WESP) units operating in a parallel configuration. The WESP functions as backend controls of process emissions from the existing feed drying, smelting, slag processing and refining operations.

These operations are currently permitted as Emission Units 1-0LEAD and 1-SRFKD. Additionally, the combustion exhaust from the seven (7) existing melting and refining kettles will be directed to the WESP.

Emissions exhausted to points EP00001, EP00002 and EP00017 will be redirected to the WESP for further control and exhausted through new Emission Point EP00026. Existing baghouses and scrubbers will remain and operated according to the full requirements of the recently issued Title V permit renewal.

Process Sources / Controls to be redirected and further controlled by the WESP are itemized as follows:

EP00001	000D1	1-SRFKD	Process, Kiln Dryer
EP00001	000B3	1-SRFKD	Control, Dryer Kiln Four-Cell Baghouse
EP00001	000R2	1-SRFKD	Process, Short Rotary Furnace
EP00001	000S2	1-SRFKD	Control, SRF Wet Scrubber
EP00001	SRFBH	1-SRFKD	Control, SRF Pulse Jet Baghouse
EP00002	000B4	1-0LEAD	Control, Kettle Four-Cell Wheelabrator Baghouse
EP00017	000R1	1-0LEAD	Process, Reverberatory Furnace
EP00017	000S1	1-0LEAD	Control, Reverberatory Wet Scrubber
EP00017	FLTAP	1-0LEAD	Process, Lead Tap

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EP00017 SCFED 1-0LEAD Process, Slag Caster
Feed
EP00017 OSLAG 1-0LEAD Process, Slag Caster &
Bin
EP00017 000B1 1-0LEAD Control, Five-Cell Process
Baghouse
EP00017 000B2 1-0LEAD Control, Two-Cell
Pulse-Jet Baghouse
EP00017 000S1 1-0LEAD Control, Reverberatory
Wet Scrubber

Exhaust gases from previous emission points EP00001, EP00002 and EP00017 will first pass through the lower, or “conditioning” section of the WESP. The conditioning section consists of a packed bed scrubber and scrubbing liquid sprays. After passing through the conditioning section, the gas enters the collection section, which is made up of an array of tubes with a high voltage electrode running through the center of each. Particulate metals collection in this area involves three steps. Initially the particles are given a negative charge by an ionizing corona produced by the electrode. Next the electrical field between the electrode and the tube wall causes the charged particles to migrate to and accumulate on the tube walls. Finally, accumulated particulate is periodically washed from the tube walls into a discharge basin at the bottom of the WESP. As the treated exhaust exits the collection section, it passes through a mist eliminator for water droplet removal prior to discharge through EP00026.

Item 17.2:

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

Emission Unit: 1-GENWP

Emission Unit Description:

One megawatt generator used to provide emergency electrical power to the WESP during periods of utility service disruption. This emission unit is exempt under 6NYCRR Part 201 but is defined for the purpose of assigning applicable 40CFR 60.JJJ requirements.

**Condition 18: Renewal deadlines for state facility permits
Effective between the dates of 06/19/2014 and 06/18/2024**

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

Item 18.1:

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

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expiration for permit renewal purposes.

Condition 19: Compliance Demonstration
Effective between the dates of 06/19/2014 and 06/18/2024

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

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 3
21 South Putt Corners Rd.
New Paltz, NY 12561

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 45 days after the reporting period.

The initial report is due 2/14/2015.

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

Condition 20: Visible Emissions Limited
Effective between the dates of 06/19/2014 and 06/18/2024

Applicable State Requirement:6 NYCRR 211.2

Item 20.1:

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

**** Emission Unit Level ****

Condition 21: Emission Point Definition By Emission Unit
Effective between the dates of 06/19/2014 and 06/18/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 21.1:

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



Emission Unit: 1-1WESP

Emission Point: 00026
Height (ft.): 120 Diameter (in.): 120
NYTMN (km.): 4590.115 NYTME (km.): 553.474

Item 21.2:

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

Emission Unit: 1-GENWP

Emission Point: 00027
Height (ft.): 20 Diameter (in.): 18
NYTMN (km.): 4590.115 NYTME (km.): 553.474

**Condition 22: Process Definition By Emission Unit
Effective between the dates of 06/19/2014 and 06/18/2024**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 22.1:

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

Emission Unit: 1-1WESP
Process: WSP
Process Description:
Final control measures provided by the Wet Electrostatic
Precipitator associated with the reverberatory furnace,
short reverberatory furnace, dryer kiln and refinery
kettles.

Emission Source/Control: CWESP - Process

Item 22.2:

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

Emission Unit: 1-GENWP
Process: WSG
Process Description: WESP emergency generator fired by natural gas.

Emission Source/Control: GENWP - Combustion
Design Capacity: 1,000 kilowatts

