

**New York State Department of Environmental Conservation  
Facility DEC ID: 4012600011**



**PERMIT  
Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 4-0126-00011/00053  
Effective Date: 08/05/2002      Expiration Date: No expiration date

Permit Issued To: ALTX INC  
201 SPRING STREET RD  
WATERVLIET, NY 12189

Facility: ALTX INC  
1A LINCOLN AVE  
WATERVLIET, NY 12189

Description:

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: WILLIAM J CLARKE  
DIVISION OF ENVIRONMENTAL PERMITS  
1150 NORTH WESTCOTT RD

, NY 12306-2014

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 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 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 and Modifications

Permit Modifications, Suspensions and Revocations by the Department

**Facility Level**

Submission of Applications for Permit Modification or Renewal -REGION 4  
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 and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**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



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transfer of ownership.

**Condition 4: Permit Modifications, Suspensions and Revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.14**

**Item 4.1:**

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) information provided 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 Applications for Permit Modification or Renewal -REGION 4 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.5(a)**

**Item 5.1:**

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

NYSDEC Regional Permit Administrator  
Region 4 Headquarters  
Division of Environmental Permits  
1150 North Westcott Rd.  
Schenectady, NY 12306-2014  
(518) 357-2069



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**Permit Under the Environmental Conservation Law (ECL)**

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

**IDENTIFICATION INFORMATION**

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Authorized Activity By Standard Industrial Classification Code:  
3317 - STEEL PIPE AND TUBES  
3398 - METAL HEAT TREATING



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6NYCRR 201-6: Facility Permissible Emissions
- \*2 6NYCRR 201-6: Compliance Demonstration
- \*3 6NYCRR 201-6: Compliance Demonstration
- \*4 6NYCRR 201-6: Compliance Demonstration
- \*5 6NYCRR 201-6: Compliance Demonstration
- 6 6NYCRR 201-6.5(g): Non Applicable requirements
- 7 6NYCRR 201-7.2: Synthetic minor facility capping provisions.
- 8 6NYCRR 212.3(a): Compliance Demonstration
- 9 6NYCRR 212.3(b): Compliance Demonstration
- 10 6NYCRR 212.4(a): Compliance Demonstration
- 11 6NYCRR 212.4(c): Compliance Demonstration
- 12 6NYCRR 212.6(a): Compliance Demonstration
- 13 6NYCRR 227-1.3(a): Compliance Demonstration
- 14 6NYCRR 229.4(b): Compliance Demonstration

**Emission Unit Level**

**EU=A-10000**

- \*15 6NYCRR 201-6: Compliance Demonstration

**EU=B-10000,EP=PHWF2**

- 16 40CFR 60.7(a), NSPS Subpart A: Modification Notification
- 17 40CFR 60.48c(a), NSPS Subpart Dc: Compliance Demonstration
- 18 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration

**EU=F-10000**

- 19 6NYCRR 226.2: General requirements
- 21 6NYCRR 226.3(a): Compliance Demonstration
- 20 6NYCRR 226.4(a): Operational Requirements - Cold Cleaning Degreasing

**EU=J-10000,EP=J0028**

- 22 6NYCRR 212.4(c): Compliance Demonstration

**EU=J-10000,EP=J0035**

- 23 6NYCRR 212.4(c): Compliance Demonstration

**EU=K-10000**

- 24 6NYCRR 212.3(b): Compliance Demonstration

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**EU=L-10000**

- 25 6NYCRR 212.4(c): Compliance Demonstration
- 26 6NYCRR 212.4(c): Compliance Demonstration

**EU=N-10000**

- 27 6NYCRR 212.4(c): Compliance Demonstration

**EU=P-10000**

- 28 6NYCRR 212.4(c): Compliance Demonstration

**EU=S-10000**

- \*29 6NYCRR 201-6: Compliance Demonstration
- 30 6NYCRR 212.4(c): Compliance Demonstration

**EU=V-10000**

- 31 6NYCRR 212.4(c): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 32 ECL 19-0301: Contaminant List
- 33 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 34 6NYCRR 201-5: Emission Unit Definition
- 35 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 36 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 37 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping. Permit Effective Date: 08/05/2002  
Permit Expiration Date: No expiration date.



**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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 200.7**

Any person who owns or operates an air contamination

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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 - 6NYCRR Part 201-1.2**

If an existing emission source was subject to the permitting requirements of 6NYCRR 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 - 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



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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 - 6NYCRR Part 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 - 6NYCRR Part 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 Part 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 Part 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



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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 Part 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 6NYCRR Part 202-1.

**Item K: Visible Emissions Limited - 6 NYCRR Part 211.3**

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.

**Item L: Open Fires - 6 NYCRR Part 215**

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**Item M: 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



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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 N: 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: Facility Permissible Emissions**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 1.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000630-08-0                      PTE: 190,000 pounds per year  
Name: CARBON MONOXIDE

CAS No: 007439-96-5                      PTE: 19,000 pounds per year  
Name: MANGANESE

CAS No: 007440-02-0                      PTE: 19,000 pounds per year  
Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 007440-47-3                      PTE: 19,000 pounds per year  
Name: CHROMIUM



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CAS No: 007446-09-5                      PTE: 190,000 pounds per year  
Name: SULFUR DIOXIDE

CAS No: 007647-01-0                      PTE: 19,000 pounds per year  
Name: HYDROGEN CHLORIDE

CAS No: 007664-39-3                      PTE: 19,000 pounds per year  
Name: HYDROGEN FLUORIDE

CAS No: 0NY075-00-5                      PTE: 190,000 pounds per year  
Name: PM-10

CAS No: 0NY100-00-0                      PTE: 47,500 pounds per year  
Name: HAP

CAS No: 0NY210-00-0                      PTE: 190,000 pounds per year  
Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0                      PTE: 95,000 pounds per year  
Name: VOC

**Condition 2: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal 6 NYCRR 201-6**

**Item 2.1:**  
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY210-00-0    OXIDES OF NITROGEN  
CAS No: 0NY075-00-5    PM-10

**Item 2.2:**  
Compliance Demonstration shall include the following monitoring:

Capping: Yes  
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS  
Monitoring Description:  
THIS FACILITY IS RESTRICTED TO BURNING 350,000,000 CUBIC FT OF NATURAL GAS OR LESS PER YEAR, AS DETERMINED BY SUMMING THE INDIVIDUAL MONTHLY FUEL USE QUANTITIES DURING ANY CONSECUTIVE 12-MONTH PERIOD, TO BE VERIFIED BY FUEL



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PURCHASE RECORDS. The volume of natural gas burned must be included in the annual report.

THE FACILITY USED THE FOLLOWING EMISSION FACTORS IN THE ABOVE DETERMINATION: NO<sub>x</sub>: GREATER THAN 100 LB/MM CF; PM-10 : 13.7 LB/MM CF.

SO<sub>2</sub>, CO AND VOC EACH HAS A POTENTIAL TO EMIT LESS THAN THE MAJOR SOURCE THRESHOLDS.

Work Practice Type: PROCESS MATERIAL THRUPUT  
Process Material: NATURAL GAS  
Upper Permit Limit: 350 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.  
The initial report is due 1/30/2003.  
Subsequent reports are due every 12 calendar month(s).

**Condition 3:**

**Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 3.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

CAS NSULFUR DIOXIDE

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

CAS No: 0NY998-00-0 VOC

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

**Item 3.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

THIS FACILITY HAS AN ANNUAL LIMIT ON THE AMOUNT OF CRITERIA CONTAMINANTS THAT MAY BE EMITTED DURING ANY CONSECUTIVE



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12-MONTH PERIOD. ANNUAL ACTUAL EMISSIONS  
WILL BE REPORTED AND CERTIFIED TO  
DEMONSTRATE COMPLIANCE WITH THE FACILITY  
CAP, AS PER THE APPENDED  
CALCULATIONS.

SO<sub>2</sub>, CO AND VOC EACH HAS A POTENTIAL TO  
EMIT LESS THAN THE MAJOR SOURCE  
THRESHOLDS.

Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2003.  
Subsequent reports are due every 12 calendar month(s).

**Condition 4: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 4.1:**  
The Compliance Demonstration activity will be performed for the Facility.

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

**Item 4.2:**  
Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

THIS FACILITY HAS A 23.75 TON PER YEAR  
LIMIT ON THE AMOUNT OF TOTAL HAPS THAT  
MAY BE EMITTED DURING ANY CONSECUTIVE  
12-MONTH PERIOD. ANNUAL ACTUAL EMISSIONS  
WILL BE REPORTED AND CERTIFIED TO  
DEMONSTRATE COMPLIANCE WITH THE FACILITY  
CAP, AS PER THE APPENDED CALCULATIONS.

Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2003.



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

**Condition 5: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal/6NYCRR 201-6**

**Item 5.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007439-96-5	MANGANESE
CAS No: 007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS
CAS No: 007440-47-3	CHROMIUM
CAS No: 007664-39-3	HYDROGEN FLUORIDE
CAS No: 007647-01-0	HYDROGEN CHLORIDE

**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

THIS FACILITY HAS A 9.5 TON PER YEAR  
LIMIT ON THE AMOUNT OF EACH INDIVIDUAL  
HAP THAT MAY BE EMITTED DURING ANY  
CONSECUTIVE 12-MONTH PERIOD. ANNUAL  
ACTUAL EMISSIONS WILL BE REPORTED AND  
CERTIFIED TO DEMONSTRATE COMPLIANCE WITH  
THE FACILITY CAP, AS PER THE APPENDED  
CALCULATIONS.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

**Condition 6: Non Applicable requirements**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal/6NYCRR 201-6.5(g)**

**Item 6.1:**

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this



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facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6NYCRR 212.10

Reason: The Subpart 201-6 cap also caps the facility out of section 212.10.

6NYCRR 216

Reason: This regulation does not apply to the facility since it processes ferro-alloy steel (see Part 216-.1(e)).

6NYCRR 227-2

Reason: The Subpart 201-6 cap also caps the facility out of Subpart 227-2.

6NYCRR 229.3(e)

Emission Unit: D10000

Reason: The Subpart 201-6 cap also caps source 00D10 out of 229.3(e) (see

229.1(d)(2)(vii)).

**Condition 7: Synthetic minor facility capping provisions.  
Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7.2**

**Item 7.1:**

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

**Item 7.2:**

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 7.3:**

On an annual basis, 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 those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

**Item 7.4:**

The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of Part 201 and of the Act.



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**Condition 8: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.3(a)**

**Item 8.1:**

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

Emission Unit: K-10000

Emission Unit: H-10000 Emission Point: H0040

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person will cause or allow emissions that violate the requirement specified in table 2, table 3 or table 4 of this Part for the environmental rating issued by the commissioner.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.3(b)**

**Item 9.1:**

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

Emission Unit: K-10000

Emission Unit: H-10000 Emission Point: H0040

Regulated Contaminant(s):

CAS No: PARTICULATES

**Item 9.2:**

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**Permit ID: 4-0126-00011/00053**

**Facility DEC ID: 4012600011**



Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable (see Table 5) and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.15 grains of particulates per cubic foot of exhaust gas, corrected for dilution air and expressed at standard conditions on a dry gas basis.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 10:**

**Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Item 10.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: D-10000

Emission Unit: E-10000

Emission Unit: I-10000

Emission Unit: J-10000

Emission Unit: L-10000

Emission Unit: N-10000

Emission Unit: P-10000

Emission Unit: S-10000

Emission Unit: U-10000

Emission Unit: A-10000

Emission Unit: H-10000 Emission Point: ESRF1



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Emission Unit: H-10000 Emission Point: H0022

Emission Unit: H-10000 Emission Point: H0029

Emission Unit: H-10000 Emission Point: H0038

Emission Unit: H-10000 Emission Point: H0043

Emission Unit: H-10000 Emission Point: H0044

Emission Unit: F-10000

Regulated Contaminant(s):  
CAS No:PARTICULATES

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Except as required under section 201.8 of this Title, no person shall cause or allow emissions that exceed the applicable permissible rate as determined from Table 2, Table 3, or Table 4 of this Part for the environmental rating issued by the commissioner.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 11: Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal/6NYCRR 212.4(c)**

**Item 11.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-10000

Emission Unit: E-10000

Emission Unit: I-10000

Emission Unit: J-10000



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Emission Unit: L-10000

Emission Unit: N-10000

Emission Unit: P-10000

Emission Unit: S-10000

Emission Unit: U-10000

Emission Unit: H-10000 Emission Point: ESRF1

Emission Unit: H-10000 Emission Point: H0022

Emission Unit: H-10000 Emission Point: H0029

Emission Unit: H-10000 Emission Point: H0038

Emission Unit: H-10000 Emission Point: H0043

Emission Unit: H-10000 Emission Point: H0044

Regulated Contaminant(s):  
CAS No:PARTICULATES

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In instances where determination of permissible emission rate using process is not applicable (see table 5) and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except as provided in 201.6 of this Title.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 12: Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Fed6NYCRR 212.6(a)**



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**Facility DEC ID: 4012600011**

**Item 12.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-10000

Emission Unit: E-10000

Emission Unit: H-10000

Emission Unit: I-10000

Emission Unit: J-10000

Emission Unit: K-10000

Emission Unit: L-10000

Emission Unit: N-10000

Emission Unit: P-10000

Emission Unit: S-10000

Emission Unit: U-10000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**New York State Department of Environmental Conservation**

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**Facility DEC ID: 4012600011**

**Condition 13: Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Fe6NYCRR 227-1.3(a)**

**Item 13.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: B-10000

Emission Unit: C-10000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 13.2:**

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 Method 9 in Appendix A of 40 CFR 60.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 14:**

**Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 229.4(b)**

**Item 14.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 14.2:**



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**Facility DEC ID: 4012600011**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Capping recordkeeping requirements

Monitoring Frequency: ANNUALLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 15: Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-10000

Regulated Contaminant(s):

HYDROGEN CHLORIDE

CAS No: 007664-39-3 HYDROGEN FLUORIDE

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

CAS No: 0NY100-00-0 HAP

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

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

THIS IS AN ANNUAL LIMIT ON THE AMOUNT OF STEEL PICKLED PER YEAR. PRODUCTION RECORDS SHALL BE MAINTAINED TO VERIFY EMISSIONS. THE VOLUME OF STEEL PICKLED MUST BE INCLUDED IN THE ANNUAL REPORT.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: METAL

Upper Permit Limit: 22050 tons per year



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Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2003.  
Subsequent reports are due every 12 calendar month(s).

**Condition 16: Modification Notification**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 60.7(a), NSPS Subpart A**

**Item 16.1:**

This Condition applies to Emission Unit: B-10000 Emission Point: PHWF2

**Item 16.2:**

Any owner or operator subject to 40 CFR Part 60 shall furnish the Administrator and this office with the following information:

- a notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless the change is specifically exempted under 40 CFR Part 60. The notice shall be post marked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productivity capability of the facility before and after the change, and the expected completion date of the change. The Administrator and/or this Department may request additional information regarding the change.

**Condition 17: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 60.48c(a), NSPS Subpart Dc**

**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-10000 Emission Point: PHWF2

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner and operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7 of this part. This notification shall include:

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(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 18:**

**Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 60.48c(g), NSPS Subpart Dc**

**Item 18.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-10000    Emission Point: PHWF2

**Item 18.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 19:**

**General requirements**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 226.2**

**Item 19.1:**

This Condition applies to    Emission Unit: F-10000

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**Item 19.2:**

No person shall conduct solvent metal cleaning unless:

- (1) Solvent is stored in covered containers and waste solvent is transferred or disposed of in such a manner that less than 20 percent of the waste solvent, by weight, can evaporate into the atmosphere;
- (2) Equipment used in solvent metal cleaning is maintained to minimize leaks and fugitive emissions;
- (3) Equipment used in solvent metal cleaning displays a conspicuous summary of proper operating procedures consistent with minimizing emissions of volatile organic compounds; and
- (4) Equipment covers are closed when the solvent metal cleaning unit is not in service.
- (5) A record of solvent consumption shall be maintained for each year and made available to the commissioner or his representative upon request.

**Condition 21: Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Fed/6NYCRR 226.3(a)**

**Item 21.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-10000

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Except where otherwise permitted by the commissioner, the following devices are required by a source owner conducting solvent metal cold cleaning degreasing:

- (1) A cover shall be provided which can be operated easily.
- (2) The drainage facility shall be internal (under cover), if practical.
- (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.7, or a water cover where the solvent is insoluble in and heavier than water, where the solvent being used has a vapor pressure greater than



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33mm Hg at 38° C (100° F) or where the solvent is heated above 50° C (120° F).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

**Condition 20: Operational Requirements - Cold Cleaning Degreasing**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Fed/6NYCRR 226.4(a)**

**Item 20.1:**

This Condition applies to Emission Unit: F-10000

**Item 20.2:**

Except where otherwise permitted by the commissioner, the following operating practices are required by a source owner conducting solvent metal cold cleaning degreasing:

- Clean parts shall be drained at least 15 seconds or until dripping ceases

**Condition 22: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 22.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: J-10000 Emission Point: J0028

Regulated Contaminant(s):  
CAS No: PARTICULATES

**Item 22.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Operating personnel will verify control device operation, via differential pressure measurement, when the Midbay Radiac is operating. A record of the pressure readings will be maintained.

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Parameter Monitored: PRESSURE CHANGE  
Lower Permit Limit: .1 inches of water  
Upper Permit Limit: 5 inches of water  
Monitoring Frequency: PER SHIFT  
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED  
RANGE AT ANY TIME  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 23: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**  
**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 23.1:**  
The Compliance Demonstration activity will be performed for:

Emission Unit: J-10000 Emission Point: J0035  
Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 23.2:**  
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE  
Monitoring Description:  
Operating personnel will verify control device operation,  
via differential pressure measurement, when the process is  
operating. A record of the pressure readings will be  
maintained.

Parameter Monitored: PRESSURE CHANGE  
Lower Permit Limit: .1 inches of water  
Upper Permit Limit: 5 inches of water  
Monitoring Frequency: PER SHIFT  
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED  
RANGE AT ANY TIME  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 24: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**  
**Applicable Federal Requirement: 6NYCRR 212.3(b)**

**Item 24.1:**



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The Compliance Demonstration activity will be performed for:

Emission Unit: K-10000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 24.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operating personnel will verify control device operation,  
by visual observation when the emission unit is operating.

A record of the observations will be maintained.

Monitoring Frequency: PER SHIFT

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 25:**

**Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 25.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: L-10000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 25.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Both grinders will not be used concurrently. A record  
documenting this will be maintained.

Monitoring Frequency: PER SHIFT

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 26:**

**Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

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**Facility DEC ID: 4012600011**



**Item 26.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: L-10000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 26.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operating personnel will verify control device operation,  
by visual observation when the emission unit is operating.  
A record of the observations will be maintained.

Monitoring Frequency: PER SHIFT

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 27: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal NY CRR 212.4(c)**

**Item 27.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: N-10000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 27.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Operating personnel will verify control device operation,  
via differential pressure measurement, when the emission  
unit is operating. A record of the pressure readings will  
be maintained.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: .15 inches of water



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Upper Permit Limit: 5 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED  
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 28: Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 28.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-10000

Regulated Contaminant(s):

CAS No: PARTICULATES

**Item 28.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operating personnel will verify control device operation,  
by visual observation when the emission unit is operating.  
A record of the observations will be maintained.

Monitoring Frequency: PER SHIFT

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 29: Compliance Demonstration**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 29.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: S-10000

Regulated Contaminant(s):

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

**Item 29.2:**

Compliance Demonstration shall include the following monitoring:

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**Facility DEC ID: 4012600011**



Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

THIS EMISSION UNIT'S ANNUAL OPERATING TIME IS LIMITED. A RECORD OF HOURS OF OPERATION SHALL BE MAINTAINED.

Work Practice Type: HOURS PER YEAR OPERATION

Upper Permit Limit: 840 hours

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

**Condition 30: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal NYCRR 212.4(e)**

**Item 30.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: S-10000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 30.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operating personnel will verify water flow to the scrubber when the emission unit is operating. A record of the verification will be maintained.

Monitoring Frequency: PER SHIFT

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 31: Compliance Demonstration**  
**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable Federal NYCRR 212.4(e)**



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**Permit ID: 4-0126-00011/00053**

**Facility DEC ID: 4012600011**

**Item 31.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: V-10000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 31.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Operating personnel will verify control device operation,  
via differential pressure measurement, when the emission  
unit is operating. A record of the pressure readings will  
be maintained.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: .15 inches of water

Upper Permit Limit: 5 inches of water

Monitoring Frequency: DAILY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED  
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**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 - 6NYCRR Part 201-1.10(a)**

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1) , and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

**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

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**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 32: Contaminant List**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable State ReqECL 19-0301**

**Item 32.1:**

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: 007440-47-3  
Name: CHROMIUM

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

CAS No: 007647-01-0  
Name: HYDROGEN CHLORIDE

CAS No: 007664-39-3  
Name: HYDROGEN FLUORIDE

CAS No: 007439-96-5  
Name: MANGANESE

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

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

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

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



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CAS No: 007446-09-5  
Name: SULFUR DIOXIDE

CAS No: 0NY998-00-0  
Name: VOC

**Condition 33:**

**Unavoidable noncompliance and violations**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-1.4**

**Item 33.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take



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appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 34: Emission Unit Definition**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 34.1:**

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

Emission Unit: A-10000

Emission Unit Description:

THIS EMISSION UNIT INVOLVES THE PICKLING OPERATION, WHICH CONSISTS OF ACID STORAGE, PICKLING TANKS, AND SPENT PICKLING SOLUTION TANKS. FOR THE PURPOSE OF COMPLETING THIS FORM, IT IS ASSUMED THAT ALL EMISSIONS VENT VIA ONE OF THE 8 WALL FANS (AWF01).

Building(s): PICKLHOUS

**Item 34.2:**

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

Emission Unit: B-10000

Emission Unit Description:

THIS EMISSION UNIT IS COMPRISED OF STATIONARY COMBUSTION DEVICES THAT BURN NATURAL GAS. THE COMBUSTION DEVICES RANGE IN HEAT CAPACITY FROM 0.03 TO 2.5 MMBTU/HR, AND ARE WATER HEATERS, DRAVO FLOOR FURNACES, SALAMANDER AND STRIP HEATERS, AND BOILERS. THIS EMISSION UNIT ALSO INCLUDES THE PICKLE HOUSE EXTRUSION BOILER, WHICH HAS A HEAT CAPACITY OF 10.46 MMBTU/HR AND IS LOCATED IN THE PICKLE HOUSE. THIS EXTRUSION BOILER VENTS TO THE ROOM; THE EMISSION POINT HAS BEEN DESIGNATED AS ONE OF THE WALL FANS (PHWF2 ). THE OTHER COMBUSTION DEVICES ARE LOCATED IN BUILDINGS THROUGHOUT THE FACILITY; THEREFORE, NO OTHER SPECIFIC BUILDINGS OR EMISSION POINTS ARE IDENTIFIED FOR THIS EMISSION UNIT. THE



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10.46 MMBTU/HR EXTRUSION BOILER IS SUBJECT TO 40 CFR PART 60, SUBPART Dc, NATURAL GAS FUEL USE IS LIMITED UNDER A FACILITY-WIDE FUEL USE CAP IN ORDER TO LIMIT EMISSIONS OF NO<sub>x</sub> AND PARTICULATES.

Building(s): PICKLHOUS

**Item 34.3:**

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

Emission Unit: C-10000

Emission Unit Description:

THIS EMISSION UNIT IS COMPRISED OF PROCESS FURNACES THAT BURN NATURAL GAS. THE FURNACES RANGE IN HEAT CAPACITY FROM 0.5 TO 27 MMBTU/HR. THE FURNACES ARE LOCATED IN TWO BUILDINGS: EXTRUSION AND PICKLE HOUSE.

THE FURNACES VENT TO THE ROOM. IN ORDER TO COMPLETE THIS APPLICATION, NEARBY WALL AND ROOF FANS HAVE BEEN DESIGNATED AS EMISSION POINTS FOR THE FURNACES THAT VENT TO THE ROOM (ESWF1 AND PHWF2). NATURAL GAS FUEL USE IS LIMITED UNDER A FACILITY-WIDE FUEL USE CAP TO LIMIT EMISSIONS OF NO<sub>x</sub> AND PARTICULATES.

Building(s): EXTRUSION  
PICKLHOUS

**Item 34.4:**

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

Emission Unit: D-10000

Emission Unit Description:

THIS EMISSION UNIT IS COMPRISED OF TANKS THAT ARE USED FOR THE STORAGE OF PRODUCTS SUCH AS OIL, DIESEL FUEL, AND ACIDS. ALL TANKS ARE EXEMPT UNDER PART 201 WITH THE EXCEPTION OF A 12,000-GALLON TANK USED TO STORE COOLANT FOR THE EXTRUSION PRESS. THE TANK IS LOCATED OUTDOORS, SO NO EMISSION POINT IS DESIGNATED FOR THIS SOURCE.

Building(s): EXTRUSION

**Item 34.5:**

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

Emission Unit: E-10000



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Emission Unit Description:

Wastewater treatment operation involving metal reduction and neutralization of waste pickling acids and rinse.

**Item 34.6:**

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

Emission Unit: F-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF SOLVENT PARTS WASHERS THAT USE NONCHLORINATED SOLVENT AND ARE SERVICED ROUTINELY BY AN OUTSIDE VENDOR SUCH AS SAFETY KLEEN. THE PARTS WASHERS ARE LOCATED IN BUILDINGS THROUGHOUT THE FACILITY; THEREFORE, THERE ARE NO SPECIFIC EMISSION POINTS OR SOURCES IDENTIFIED FOR THIS EMISSION UNIT.

**Item 34.7:**

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

Emission Unit: G-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF ACTIVITIES THAT GENERATE FUGITIVE DUST EMISSIONS, SUCH AS WIND EROSION AND VEHICLE TRAVEL ON ROADS. THERE ARE NO SPECIFIC EMISSION POINTS OR SOURCES IDENTIFIED FOR THIS EMISSION UNIT.

**Item 34.8:**

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

Emission Unit: H-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF STEEL GRINDING AND CUTTING ACTIVITIES THAT GENERATE PARTICULATE EMISSIONS. THIS EMISSION UNIT INCLUDES EPS H0022, H0029, H0038, H0040, H0043, AND H044 LOCATED IN THE FINISHING AND EXTRUSION BUILDINGS. IN ADDITION, THE EMISSION POINT FOR SOURCE H09 (PIERCING PRESS), WHICH VENTS TO THE ROOM, IS DESIGNATED AS A ROOF FAN IN THE EXTRUSION SHOP (EP 3SRF1).

Building(s): EXTRUSION  
FINISHING  
TECHSERV



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**Item 34.9:**

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

Emission Unit: I-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF THE SHELL MOLDING AND CASTING OPERATION, WHICH INVOLVES SAND HEATING, MOLD BREAKING, MOLD GLUEING, SANDBLAST CLEANING, AND MOLD STORAGE. THE EMISSION UNIT INCLUDES EPS I021A, I021B, AND I021C, LOCATED IN THE EXTRUSION SHOP.

Building(s): EXTRUSION

**Item 34.10:**

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

Emission Unit: J-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF TWO RADIAC SAWS (EPS J0035 AND J0028) THAT ARE USED TO CUT STEEL. BOTH RADIACS ARE EQUIPPED WITH A PARTICULATE MATTER CONTROL DEVICE AND BOTH ARE LOCATED IN THE EXTRUSION SHOP.

Building(s): EXTRUSION

**Item 34.11:**

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

Emission Unit: K-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF ONE RADIAC SAW (EP K0036) THAT IS USED TO CUT STEEL. THE SAW IS EQUIPPED WITH A PARTICULATE MATTER CONTROL DEVICE AND IS LOCATED IN THE

EXTRUSION SHOP.

Building(s): EXTRUSION

**Item 34.12:**

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

Emission Unit: L-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF TWO GRINDERS (EP L0032) THAT ARE USED TO GRIND STEEL. THE GRINDERS ARE EQUIPPED WITH A PARTICULATE MATTER CONTROL DEVICE AND ARE LOCATED IN THE EXTRUSION SHOP.

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Building(s): EXTRUSION

**Item 34.13:**

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

Emission Unit: N-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF THE EXTRUSION OPERATION, WHICH INCLUDES HEATING SLUGS PRIOR TO EXTRUSION (EP N0026) AND EXTRUDING THE SLUGS (ESRF2). THE SLUG HEATING SOURCE IS VENTED VIA A STACK (N0026), WHILE THE EXTRUDER, WHICH IS CONTROLLED TO REDUCE EMISSIONS OF PARTICULATE MATTER, VENTS TO THE ROOM. FOR THE PURPOSE OF COMPLETING THIS APPLICATION, IT IS ASSUMED THAT THE EMISSIONS RESULTING FROM THE EXTRUDER ARE VENTED VIA ONE ROOF FAN (ESFR2) THAT IS LOCATED NEAR THE SOURCE.

Building(s): EXTRUSION

**Item 34.14:**

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

Emission Unit: P-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF THE PILGER MILL SAW, WHICH IS USED TO CUT TUBES FROM THE PILGER MILL TUBE REDUCER. THE SAW VENTS VIA EP P0001, AND IS LOCATED IN THE EXTRUSION SHOP.

Building(s): EXTRUSION

**Item 34.15:**

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

Emission Unit: S-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF THE FLAME SPRAY UNIT (EP 20027), WHICH IS A HIGH ENERGY PLASMA PROCEDURE FOR THE CRAMIC COATING OF WORK PIECES, AND IS LOCATED IN THE EXTRUSION SHOP.

Building(s): EXTRUSION



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**Item 34.16:**

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

Emission Unit: U-10000

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF MISCELLANEOUS MAINTENANCE CUTTING AND GRINDING OPERATIONS LOCATED IN THE EXTRUSION SHOP, INCLUDING EPS ESEWF AND ESRF3. THESE OPERATIONS VENT TO THE ROOM AND HAVE BEEN ASSIGNED TO THE NEAREST WALL OR ROOF FAN TO ESTABLISH THEIR EMISSION POINTS.

Building(s): EXTRUSION

**Item 34.17:**

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

Emission Unit: V-10000

Emission Unit Description:

Recovery Saw

**Condition 35: Air pollution prohibited**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable State R6NYCRR 211.2**

**Item 35.1:**

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.

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

**Condition 36: Emission Point Definition By Emission Unit**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 36.1:**

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

Emission Unit: A-10000



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Emission Point:	H0022			Building:	EXTRUSION
Height (ft.):	10	Diameter (in.):	8	Building:	FINISHING
Emission Point:	H0029			Building:	EXTRUSION
Height (ft.):	30	Diameter (in.):	14		
Emission Point:	H0038			Building:	EXTRUSION
Height (ft.):	25	Length (in.):	11	Width (in.):	12
		Building:	TECHSERV		
Emission Point:	H0040			Width (in.):	12
Height (ft.):	Length (in.):	12		Building:	EXTRUSION
Emission Point:	H0043				
Height (ft.):	6	Diameter (in.):	7	Building:	FINISHING
Emission Point:	H0044				
Height (ft.):	48	Diameter (in.):	8	Building:	EXTRUSION

**Item 36.6:**

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

Emission Unit:	I-10000				
Emission Point:	I021A				
Height (ft.):	60	Diameter (in.):	24	Building:	EXTRUSION
Emission Point:	I021B				
Height (ft.):	14	Diameter (in.):	24	Building:	EXTRUSION
Emission Point:	I021C				
Height (ft.):	35	Diameter (in.):	22	Building:	EXTRUSION

**Item 36.7:**

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

Emission Unit: J-10000



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Building: EXTRUSION

**Item 36.12:**

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

Emission Unit: S-10000

Emission Point: S0027  
Height (ft): 11  
Diameter (in.): 11

Building: EXTRUSION

**Item 36.13:**

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

Emission Unit: U-10000

Emission Point: ESEWF  
Height (ft.): 15  
Diameter (in.): 32

Building: EXTRUSION

Emission Point: ESRF3  
Height (ft.): 48  
Diameter (in.): 44

Building: EXTRUSION

**Condition 37:**

**Process Definition By Emission Unit**

**Effective between the dates of 08/05/2002 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 37.1:**

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

Emission Unit: B-10000  
Process: ONG  
Process Description: firing of natural gas

Emission Source/Control: 00B21 - Combustion

**Item 37.2:**

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

Emission Unit: C-10000  
Process: 1NG  
Process Description: firing of natural gas

Emission Source/Control: 00C01 - Process

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Emission S00C02 - Process

Emission Source/Control: 00C03 - Process

Emission Source/Control: 00C04 - Process