



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-3016-00057/00028
Mod 0 Effective Date: 04/02/2003 Expiration Date: No expiration date.
Mod 1 Effective Date: 12/15/2009 Expiration Date: No expiration date.
Mod 2 Effective Date: 08/11/2010 Expiration Date: No expiration date.

Permit Issued To: ELG UTICA ALLOYS INC
PO BOX 53
UTICA, NY 13503

Contact: JOSEPH R JIAMPINETRO
P O BOX 1606
UTICA, NY 13503-1606

Facility: ELG UTICA ALLOYS INC
91 WURZ AVE
UTICA, NY 13502

Contact: BRET COPPLE
UTICA ALLOYS
91 WURZ AVE PO BOX 53
UTICA, NY 13501-0053
(315) 733-0475

Description:

ELG Utica Alloys is changing from a two kiln line to ma three kiln line.

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: PATRICK M CLEAREY
NYSDEC - REG 6
207 GENESEE ST
UTICA, NY 13501

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 6 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA



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

Condition 2: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 2.1:

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 2.2:

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 2.3:

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 1: Relationship of this Permit to Other Department Orders and Determinations

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

Item 1.1:

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 1-1: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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 1-1.2:

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 1-1.3:

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.

GENERAL CONDITIONS FOR PERMITS FOR TITLE V FACILITY PERMITS



Applicable State Requirement: 6 NYCRR 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 transfer of ownership.

Condition 1-3: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-3.1:

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

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

Condition 1-2: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-2.1:

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

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



Condition 4: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6 NYCRR 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) 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 Applications for Permit Modification or Renewal -REGION 6 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.5 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 6 Headquarters
Division of Environmental Permits
State Office Building, 317 Washington Street
Watertown, NY 13601-3787
(315) 785-2245

Condition 1-4: Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 1-4.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 6 Sub-office
Division of Environmental Permits
State Office Building, 207 Genesee Street
Utica, NY 13501-2885
(315) 793-2555

New York State Department of Environmental Conservation

Permit ID: 6-3016-00057/00028

Facility DEC ID: 6301600057



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To:ELG UTICA ALLOYS INC
PO BOX 53
UTICA, NY 13503

Facility: ELG UTICA ALLOYS INC
91 WURZ AVE
UTICA, NY 13502

Authorized Activity By Standard Industrial Classification Code:
5093 - SCRAP AND WASTE MATERIALS

Mod 0 Permit Effective Date: 04/02/2003
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 12/15/2009
date.

Permit Expiration Date: No expiration

Mod 2 Permit Effective Date: 08/11/2010
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-1 6 NYCRR 201-7.2: Facility Permissible Emissions
- *2-1 6 NYCRR 201-7.2: Capping Monitoring Condition
- *1-2 6 NYCRR 201-7.2: Capping Monitoring Condition
- 2-2 6 NYCRR 212.4 (a): Compliance Demonstration
- 1-6 6 NYCRR 212.4 (a): Compliance Demonstration
- 2-3 6 NYCRR 212.4 (c): Compliance Demonstration
- 2-4 6 NYCRR 212.6 (a): Compliance Demonstration
- 2-5 6 NYCRR 212.10 (c) (4) (i): Compliance Demonstration
- 2-6 6 NYCRR 212.11 (b) (1): Compliance Demonstration
- 1-10 6 NYCRR Part 226: Compliance Demonstration
- 1-11 6 NYCRR 226.2: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 20 ECL 19-0301: Contaminant List
- 1-12 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 22 6 NYCRR Subpart 201-5: Emission Unit Definition
- 1-13 6 NYCRR 211.2: Air pollution prohibited
- 1-14 6 NYCRR 211.2: Compliance Demonstration

Emission Unit Level

- 24 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 25 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



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: Visible Emissions Limited - 6 NYCRR 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 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 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 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 1-1: Facility Permissible Emissions
Effective between the dates of 12/15/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 2-1.1:

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:

per year	CAS No: 001313-99-1	(From Mod 2)	PTE: 17.54 pounds
	Name: NICKEL OXIDE		
per year	CAS No: 0NY998-00-0	(From Mod 2)	PTE: 90,000 pounds
	Name: VOC		

Condition 2-1: Capping Monitoring Condition
Effective between the dates of 08/11/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 2-1.1:

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

6 NYCRR 212.4 (b)

Item 2-1.2:

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

Item 2-1.3:

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

Item 2-1.4:

New York State Department of Environmental Conservation

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Facility DEC ID: 6301600057



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

Item 2-1.5:

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

Item 2-1.6:

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

Emission Unit: 1-10001

Emission Unit: 3-KILN3

Emission Unit: 4-KILN4

Regulated Contaminant(s):
CAS No: 001313-99-1 NICKEL OXIDE

Item 2-1.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

DAR-1 modeling indicates that the AGC for Nickel Oxide (metal HAP) will be exceeded if this kiln is operated continuously at its maximum capacity of 4,000 lbs/hr. Facility shall avoid such an exceedence by restricting, at each of three kilns, the throughput of cleaned nickel turnings to not more than 9,000,000 pounds per 12 consecutive month period per kiln.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: METAL

Upper Permit Limit: 9,000,000 pounds 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 1/30/2011.

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

Condition 1-2: Capping Monitoring Condition
Effective between the dates of 12/15/2009 and Permit Expiration Date



Applicable Federal Requirement:6 NYCRR 201-7.2

Item 1-2.1:

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

- 6 NYCRR 201-6.1 (a)
- 6 NYCRR 212.10 (a) (2)

Item 1-2.2:

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

Item 1-2.3:

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

Item 1-2.4:

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

Item 1-2.5:

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

Item 1-2.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility shall ensure that emissions of volatile organic compounds (VOC), including those from permitted, exempt (including VOC emissions from ALL Techtride DG usage) and



trivial sources, remain less than 45 tons per 12 consecutive month period.

Records: Facility shall maintain records that verify the facilities' monthly VOC emissions. Such records shall be maintained at the facility for a minimum period of five years.

Reports: Report shall be submitted annually in a format acceptable to the Commissioner's representative. The report shall document that the facilities' VOC emissions were less than 45 tons during any consecutive 365-day period. The report shall also include all emission factors and other related data that was used in the calculation.

Any noncompliance with the 45 ton VOC emission limit in this condition must be reported to NYSDEC Region 6 (Utica) within 30 days of the occurrence.

Parameter Monitored: VOC
Upper Permit Limit: 90,000 pounds per year
Reference Test Method: EPA Reference Method 25A
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 1/30/2010.
Subsequent reports are due every 12 calendar month(s).

Condition 2-2: Compliance Demonstration
Effective between the dates of 08/11/2010 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Item 2-2.1:

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

Emission Unit: 1-10001
Process: 302 Emission Source: C3002

Emission Unit: 3-KILN3
Process: 303 Emission Source: K3BHS

Emission Unit: 4-KILN4
Process: 401 Emission Source: C4002

Regulated Contaminant(s):
CAS No: 001306-19-0 CADMIUM OXIDE
CAS No: 001307-96-6 COBALT OXIDE
CAS No: 001308-38-9 CHROME (III) OXIDE

New York State Department of Environmental Conservation

Permit ID: 6-3016-00057/00028

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CAS No: 001313-13-9	MANGANESE OXIDE
CAS No: 001313-99-1	NICKEL OXIDE
CAS No: 001317-36-8	LEAD MONOOXIDE (PIGMENT YELLOW 46)
CAS No: 007439-97-6	MERCURY
CAS No: 007446-08-4	SELENIUM DIOXIDE
CAS No: 007647-01-0	HYDROGEN CHLORIDE
CAS No: 001314-60-9	ANTIMONY OXIDE
CAS No: 0NY075-00-0	PARTICULATES

Item 2-2.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Facility shall ensure that AGCs of the referenced HAP particulates are not exceeded by providing effective cartridge filter maintenance that is in accord with the manufacturer's specifications. Cartridge filter unit shall be operated within the referenced pressure drop parameters while the associated kiln is in operation. Manometer readings below 1" WC and above 6" WC shall require immediate root cause analysis and then expedient corrective action. Manometers shall be monitored and recorded once per week while the filter is in operation. This record and all other filter maintenance records shall be kept for a minimum period of five years.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 6 inches of water

Reference Test Method: EPA Reference Methods 5, 26 & 29

Monitoring Frequency: WEEKLY

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED
RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

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

Condition 1-6: Compliance Demonstration

Effective between the dates of 12/15/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 1-6.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 3-KILN3

Emission Point: K3EP4

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 6-3016-00057/00028

Facility DEC ID: 6301600057



CAS No: 001313-99-1 NICKEL OXIDE

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission point K3EP4 is an emergency overheat release stack for emission unit 3-KILN3. In the event of its use, the entire exhaust stream would be released to the atmosphere prior to the particulate removal functions of baghouse K3BHS, including nine metal HAPs and hydrogen chloride PMs. This release, if it were to persist for a sufficient time, could result in an AGC exceedence of nickel and/or other HAPs. The 3-KILN3 system is programmed to immediately shut down the kiln if this stack were to become active. Facility shall monitor and log any time period for which K3EP4 were to be active. Every Annual Monitoring Report shall present an entry that references the status of K3EP4 activity (even if none) during the applicable reporting period.

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2010.

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

Condition 2-3: Compliance Demonstration

Effective between the dates of 08/11/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 2-3.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-10001 Emission Point: NEW01

Emission Unit: 3-KILN3 Emission Point: K3EP3

Emission Unit: 4-KILN4 Emission Point: K4EP4

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

Item 2-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL



DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Emissions of solid particles are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions and on a dry gas basis.

Performance testing (EPA RM 5) is the only true method to prove compliance with this standard and shall be conducted at the discretion of the Department.

In the absence of a formal stack test, facility shall attest to compliance by visually monitoring and recording the exhaust plume from each involved emission point. These observations shall be recorded in a log book which shall be submitted annually and shall be retained for a five year period.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.05 grains per dscf
Reference Test Method: EPA Reference Method 5
Monitoring Frequency: DAILY
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2011.
Subsequent reports are due every 12 calendar month(s).

Condition 2-4: Compliance Demonstration
Effective between the dates of 08/11/2010 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 2-4.1:

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

Emission Unit: 1-10001 Emission Point: NEW01

Emission Unit: 3-KILN3 Emission Point: K3EP3

Emission Unit: 4-KILN4 Emission Point: K4EP4

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

Item 2-4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 6-3016-00057/00028

Facility DEC ID: 6301600057



CAS No: 007647-01-0 HYDROGEN CHLORIDE
CAS No: 0NY998-00-0 VOC

Item 2-6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to ensure that the VOC and HCl destruction efficiency of the thermal oxidizer will meet the criteria of 6 NYCRR 212.10(c)(4), the oxidizer outlet temperature shall not fall below 1350 degrees Fahrenheit. This temperature shall be continuously monitored and recorded whenever the associated kiln is processing chips. The source of this VOC and HCl is from residual machine tool coolants that arrive on turnings. The 1350 degree limitation was determined during a 5/2002 stack test on oxidizer C3001 and has been accepted (without test) as the functional lower limit for oxidizers K3OXD and C4001. NYSDEC reserves the right to require, on demand, stack testing of K3OXD and C4001. Otherwise, facility is required to maintain the operational integrity of this oxidizer and facility shall create and file such maintenance records for a minimum five year period.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1350 degrees Fahrenheit

Reference Test Method: EPA Reference Methods 25A & 26

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL LOWER THAN
STATED VALUE BELOW AVERAGE STACK TEST
TEMP

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

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

Condition 1-10: Compliance Demonstration

Effective between the dates of 12/15/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR Part 226

Item 1-10.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00002

Process: 201

Emission Source: S2002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

6NYCRR 226. Requirements for Conveyorized Degreasers
(For nonTitle V)

A. Equipment Specifications

The following types of control equipment must be used when conducting conveyorized degreasing, solvent metal cleaning:

- (1) One of the following:
 - (i) a refrigerated chiller; or
 - (ii) local exhaust ventilation and a carbon adsorption unit, or an equivalent system, for collection of VOCs.
- (2) A drying tunnel, rotating basket or other device acceptable to the Department which prevents carry-out of VOCs.
- (3) Safety switches which shut off the system when the degreaser malfunctions.
- (4) Minimize openings at the entrance and exit of the degreaser.

B. Operating Requirements:

- (1) Exhaust ventilation rate shall not exceed 125 percent of the minimum ventilation rate required for the protection of workers in the vicinity of the degreaser.
- (2) Minimize carry-out emissions by:
 - (i) proper racking for best drainage; and
 - (ii) maintaining a conveyor speed at less than 11 ft/min.
- (3) Water must not be visibly detectable in the solvent leaving the water separator.

C. General Requirements:

A Person conducting solvent metal cleaning must:

- (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
- (2) Maintain equipment to minimize leaks and fugitive emissions.



- (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
- (4) Keep the degreaser cover closed except when:
 - (a) parts are being placed into or being removed from the degreaser;
 - (b) adding or removing solvent from the degreaser;or
 - (c) no solvent is in the degreaser.
- (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
- (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2010.
Subsequent reports are due every 12 calendar month(s).

Condition 1-11: Compliance Demonstration
Effective between the dates of 12/15/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 226.2

Item 1-11.1:

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

Emission Unit: 0-00002

Regulated Contaminant(s):

CAS No: 000075-05-8	ACETONITRILE
CAS No: 000106-88-7	ETHYL OXIRANE
CAS No: 0NY998-00-0	VOC

Item 1-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Facility operates one exempt [per 6 NYCRR 201-3.3 (c)(39)(iv) and also per 6 NYCRR 226.6(2)] open-top vapor degreaser that operates with non-halogenated solvent. At 1.7 ft², the open-top area is less than 11 ft², which is the exemption threshold. In 2009, the solvent in use is Techtride DG and this solvent has been modeled with DAR-1 and has been found to exhibit no SGC or AGC exceedences.

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Facility shall calculate degreaser VOC emissions from solvent usage records and current MSDS information. Both acetonitrile and ethyl oxirane are both VOC and HAP. Degreaser emissions shall be separately itemized and then added into total facility VOC calculation on the Annual Monitoring Report. Records shall be maintained for a minimum period of five years.

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 1/30/2010.

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 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 law.

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.



Condition 20: Contaminant List

Effective between the dates of 04/02/2003 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 20.1:

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

CAS No: 000075-05-8

Name: ACETONITRILE

CAS No: 000106-88-7

Name: ETHYL OXIRANE

CAS No: 001306-19-0

Name: CADMIUM OXIDE

CAS No: 001307-96-6

Name: COBALT OXIDE

CAS No: 001308-38-9

Name: CHROME (III) OXIDE

CAS No: 001313-13-9

Name: MANGANESE OXIDE

CAS No: 001313-99-1

Name: NICKEL OXIDE

CAS No: 001314-60-9

Name: ANTIMONY OXIDE

CAS No: 001317-36-8

Name: LEAD MONOOXIDE (PIGMENT YELLOW 46)

CAS No: 007439-97-6

Name: MERCURY

CAS No: 007446-08-4

Name: SELENIUM DIOXIDE

CAS No: 007647-01-0

Name: HYDROGEN CHLORIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC



Condition 1-12: Unavoidable noncompliance and violations
Effective between the dates of 12/15/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-12.1:

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 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 22: Emission Unit Definition
Effective between the dates of 04/02/2003 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 22.1(From Mod 2):

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

Emission Unit: 1-10001

Emission Unit Description:

This emission unit consists of a nickel-chip processing line whose purpose is both to burn off residual machine-tool coolant oils and to vaporize residual water that remains from a previous washing operation. Two natural gas-fired burners provide heat to the rotary kiln. Kiln exhaust goes through a cyclone, a natural gas-fired thermal oxidizer, a gas cooler (heat exchanger reduces temp to protect a cartridge filter, dumps heat to atmosphere), a cartridge filter and a stack (EP=NEW01). Several blowers move this airstream. Cartridge filter removes various metal HAPs (oxide forms of: nickel, cobalt, antimony, cadmium, chromium, lead, manganese, mercury & selenium) which originate from nickel-based turnings plus hydrogen chloride PM which forms from various chlorinated coolant oils. Oxidizer destroys VOC from various coolant oils. Line was installed in 2001 and has been known as Kiln #2. This emission unit was stack tested once in 2002 for VOC, PM and Nickel.

Building(s): NO.1

Item 22.2(From Mod 2):

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

Emission Unit: 3-KILN3

Emission Unit Description:

This emission unit consists of a nickel-chip processing line whose purpose is both to burn off residual machine-tool coolant oils and to vaporize residual water that remains from a previous washing operation. Two natural gas-fired burners provide heat to the rotary kiln. Kiln exhaust goes through a cyclone, a heat recuperator (pre-heat for oxidizer), a natural gas-fired thermal oxidizer, a gas cooler (heat exchanger reduces temp to protect a cartridge filter, dumps heat to atmosphere), a cartridge filter and a stack (EP=K3EP3). Several blowers move this airstream. Cartridge filter removes various metal HAPs (oxide forms of: nickel, cobalt, antimony, cadmium, chromium, lead, manganese, mercury & selenium) which originate from nickel-based turnings plus hydrogen chloride PM which originates from chlorinated coolant



oils. Oxidizer destroys VOC from various coolant oils.
Line was installed in 2008 and has been known as Kiln #3.
At this writing (3/2009), this EU has never been stack tested.

Building(s): NO.1

Item 22.3(From Mod 2):

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

Emission Unit: 4-KILN4

Emission Unit Description:

This emission unit consists of a nickel-chip processing line whose purpose is both to burn off residual machine-tool coolant oils and to vaporize residual water that remains from a previous washing operation. Four natural gas-fired burners provide heat to the rotary kiln. Kiln exhaust goes through a cyclone, a natural gas-fired thermal oxidizer, a gas cooler (heat exchanger reduces temp to protect a cartridge filter unit, dumps heat to atmosphere), a cartridge filter unit and a stack (EP=K4EP4). Several blowers move this airstream. Cartridge filter unit removes various metal HAPs (oxide forms of: nickel, cobalt, antimony, cadmium, chromium, lead, manganese, mercury & selenium) which originate from nickel-based turnings plus hydrogen chloride PM which forms from various chlorinated coolant oils. Oxidizer destroys VOC from various coolant oils.

Note: The three control devices that operate in this emission unit have been expired from this permit in 2009 and now (August 2010) have been reinstated, but under new source names. This group (cyclone, oxidizer & cartridge filter) had been stack tested in 9/2001 for PM, HCl and VOC.

Building(s): NO.1

Item 22.4(From Mod 1):

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

Emission Unit: 0-00002

Emission Unit Description:

This emission unit consists of two solvent vapor degreasing units; an open-top vapor degreaser and a conveyORIZED vapor degreaser. An Ultra-Kool (model 1012) cleans lab sample (chips) prior to quality analysis. A Detrex (model V8) in-line vibratory degreaser is fully permitted to run, but has been mothballed since 2003. Both units are permitted to operate with only a non-halogenated solvent, which currently is (but not limited to) Techtride DG. Techtride DG is 100% VOC and also contains two HAPs: 0.5% ethyl oxirane and 0.25% acetronitile.

Building(s): NO.1



Condition 1-13: Air pollution prohibited
Effective between the dates of 12/15/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 1-13.1:

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 1-14: Compliance Demonstration
Effective between the dates of 12/15/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 1-14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint phone line available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.
5. Report in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2010.

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



**** Emission Unit Level ****

Condition 24: Emission Point Definition By Emission Unit
Effective between the dates of 04/02/2003 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1(From Mod 2):

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

Emission Unit: 1-10001

Emission Point: NEW01

Height (ft.): 34

Diameter (in.): 14

NYTMN (km.): 4772.461 NYTME (km.): 482.662 Building: NO.1

Item 24.2(From Mod 2):

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

Emission Unit: 3-KILN3

Emission Point: K3EP3

Height (ft.): 34

Diameter (in.): 10

NYTMN (km.): 4772.485 NYTME (km.): 482.666 Building: NO.1

Emission Point: K3EP4

Height (ft.): 31

Diameter (in.): 12

NYTMN (km.): 4772.484 NYTME (km.): 482.665 Building: NO.1

Item 24.3(From Mod 2):

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

Emission Unit: 4-KILN4

Emission Point: K4EP4

Height (ft.): 26

Diameter (in.): 14

NYTMN (km.): 4772.443 NYTME (km.): 482.655 Building: NO.1

Condition 25: Process Definition By Emission Unit

Effective between the dates of 04/02/2003 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1(From Mod 2):

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

Emission Unit: 1-10001

Process: 302

Source Classification Code: 3-04-010-99

Process Description:

Washed nickel chips (turnings) are metered into a natural gas-fired rotary kiln, where remaining machine tool coolants are oxidized and washwater is evaporated off.



Exhaust is routed through a cyclone, a natural gas-fired thermal oxidizer (destroys VOCs from residual coolant oils), a heat exchanger (reduce temp to protect cartridge filter) and then a cartridge filter unit (picks up nine different metal HAP particles plus HCl particulates which originate from chlorinated coolant oils) before final atmospheric release through a stack (EP=NEW01). Two kiln burners cumulatively total at 3 MMBtu/hr, burner exhaust is segregated from kiln airstream (vented separately).

Emission Source/Control: C3000 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: C3001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: C3002 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S3000 - Process
Design Capacity: 4,000 pounds per hour

Item 25.2(From Mod 2):

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

Emission Unit: 3-KILN3

Process: 303

Source Classification Code: 3-04-010-99

Process Description:

Washed nickel chips (turnings) are metered into a natural gas-fired rotary kiln, where remaining machine tool coolants are oxidized and washwater is dried off. Exhaust is routed through a cyclone, a heat recuperator (uses kiln exhaust heat to pre-heat oxidizer intake combustion air), a natural gas-fired thermal oxidizer (destroys VOCs from residual coolant oils), a heat exchanger (reduce temp to protect cartridge filter, dumps this heat into atmosphere) and then a cartridge filter unit (picks up nine different metal HAP particles plus HCl particles which form from chlorinated coolant oils) before final atmospheric release through a stack (EP=K3EP3). Two kiln burners cumulatively total at 3 MMBtu/hr; burner exhaust is segregated from kiln airstream.

This process also has an emergency exhaust-release stack (EP=K3EP4) whose design is to dump the entire exhaust stream (in an overheat scenario) into the atmosphere immediately prior to cartridge filter control. If this were to occur, nine metal HAPs plus hydrogen chloride PM would realize an uncontrolled release. This system is designed to shut down Kiln #3 if such an overheat were to occur. The status of K3EP4 activity or inactivity shall be addressed in every Annual Monitoring Report.

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Emission Source/Control: K3BHS - Control
Control Type: FABRIC FILTER

Emission Source/Control: K3CYL - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: K3OXD - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: K3KLN - Process
Design Capacity: 40 cubic feet per hour

Item 25.3(From Mod 2):

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

Emission Unit: 4-KILN4

Process: 401

Source Classification Code: 3-04-010-99

Process Description:

Washed nickel chips (turnings) are metered into a natural gas-fired rotary kiln, where remaining machine tool coolants are oxidized and washwater is evaporated off. Exhaust is routed through a cyclone, a natural gas-fired thermal oxidizer (destroys VOCs from residual coolant oils), a heat exchanger (reduce temp to protect cartridge filter) and then a cartridge filter (picks up nine different metal HAP particles plus HCl particulates which originate from chlorinated coolant oils) before final atmospheric release through a stack (EP=K4EP4). Four kiln burners cumulatively total at 2 MMBtu/hr, burner exhaust is segregated from kiln airstream (vented separately). This kiln (S4000) is the former source #S3000 that had been removed from the facility and the permit in April 2009 and subsequently has been refurbished and reinstated.

Emission Source/Control: C4000 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: C4001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: C4002 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S4000 - Process

Item 25.4(From Mod 1):

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

Emission Unit: 0-00002

Process: 201

Source Classification Code: 4-01-002-35



Process Description:

This process involves the operation of a Detrex V8 in-line vibratory (conveyorized) degreaser. Unit uses a non-halogenated solvent. Purpose of unit is to clean nickle machine tool turnings. There is no emission point for this process.

Emission Source/Control: S2002 - Process

Emission Source/Control: S2003 - Process

