



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 7-3556-00001/00108  
Mod 0 Effective Date: 09/30/2013 Expiration Date: 09/29/2023  
Mod 1 Effective Date: 01/12/2016 Expiration Date: 09/29/2023

Permit Issued To: NOVELIS CORPORATION  
448 CO RTE 1A  
OSWEGO, NY 13126

Facility: NOVELIS CORPORATION  
448 CO RTE 1A  
OSWEGO, NY 13126-0028

Contact: DAVID NEUNER  
NOVELIS CORPORATION  
448 CO RTE 1A PO BOX 28  
OSWEGO, NY 13126-0028

Description:  
This permit modification (1) caps emissions of NO<sub>x</sub> from the CASH lines at less than 40 tons per year, (2) increases the maximum heat input to the PUSHER 2 furnace, (3) increases the heat input to Annealing 3 and Reheat furnace 3, (4) adds small combustion devices that would ordinarily be exempt but are now part of an emissions cap, and (5) adds 2 scrap dryers previously believed to be exempt.

All the equipment is currently installed (authorized under the original ASF permit) except PUSHER Furnace 2.

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 7355600001**



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:           ELIZABETH A TRACY  
  615 ERIE BLVD WEST  
  SYRACUSE, NY 13204-2400

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, modifications and transfers
  - Permit modifications, suspensions or revocations by the Department

**Facility Level**

- Submission of application for permit modification or renewal-REGION 7 HEADQUARTERS



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

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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



**Condition 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 renewal application at least 180 days before expiration of permits for both Title V and 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.

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

**Item 4.1:**

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

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

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of application for permit modification or renewal-REGION 7 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 7 Headquarters  
Division of Environmental Permits  
615 Erie Blvd West  
Syracuse, NY 13204-2400  
(315) 426-7400

**New York State Department of Environmental Conservation**

Permit ID: 7-3556-00001/00108

Facility DEC ID: 7355600001



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: NOVELIS CORPORATION  
448 CO RTE 1A  
OSWEGO, NY 13126

Facility: NOVELIS CORPORATION  
448 CO RTE 1A  
OSWEGO, NY 13126-0028

Authorized Activity By Standard Industrial Classification Code:  
3341 - SECONDARY NONFERROUS METALS  
3353 - ALUMINUM SHEET PLATE & FOIL

Mod 0 Permit Effective Date: 09/30/2013

Permit Expiration Date: 09/29/2023

Mod 1 Permit Effective Date: 01/12/2016

Permit Expiration Date: 09/29/2023



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 2 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Demonstration
- 3 6 NYCRR 201-6.4 (e): Compliance Demonstration
- 4 6 NYCRR 201-6.2 (a) (3): Compliance Demonstration
- 5 6 NYCRR 201-6.4: Compliance Demonstration
- 1-1 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 1-2 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- \*1-3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*1-4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*1-5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*1-6 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*6 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*7 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*8 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 9 6 NYCRR Subpart 202-1: Compliance Demonstration
- 10 6 NYCRR 211.1: Air pollution prohibited
- 12 6 NYCRR 212.4 (c): Compliance Demonstration
- 14 6 NYCRR 212.6 (a): Compliance Demonstration
- 16 6 NYCRR 227-1.3: Compliance Demonstration

#### Emission Unit Level

##### EU=0-000CL,Proc=SDR

- 1-7 40CFR 63, Subpart RRR: Compliance Demonstration

##### EU=N-PUSHR,Proc=PF2,ES=PUSH2

- 1-8 6 NYCRR 227-2.4 (g): Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 27 ECL 19-0301: Contaminant List
- 28 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 29 6 NYCRR Subpart 201-5: Emission Unit Definition
- 30 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 31 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 32 6 NYCRR 211.2: Visible Emissions Limited
- 1-9 6 NYCRR 212-2.1: Compliance Demonstration
- 33 6 NYCRR 212.4 (b): Compliance Demonstration
- 34 6 NYCRR 212.4 (b): Compliance Demonstration

#### Emission Unit Level

- 35 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 36 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: Open Fires Prohibitions - 6 NYCRR 215.2**

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

**Item L: Permit Exclusion - ECL 19-0305**

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

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

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

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1: Records of Monitoring, Sampling, and Measurement**



**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (2)**

**Item 1.1:**

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**Condition 2: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (3) (ii)**

**Item 2.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 2.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as



identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. 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. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.



In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2013.

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

**Condition 3: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (e)**

**Item 3.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 3.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;



- whether compliance was continuous or intermittent;
- the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
- such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
- and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866

The address for the RAPCE is as follows:

NYSDEC Region 7 Headquarters  
615 Erie Boulevard, West  
Syracuse, NY 13204-2400

The address for the BQA is as follows:



NYSDEC  
Bureau of Quality Assurance  
625 Broadway  
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 4/30/2014.  
Subsequent reports are due on the same day each year

**Condition 4: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR 201-6.2 (a) (3)**

**Item 4.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 4.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A Title V permit modification application must be submitted to the Department within one year of commencement of operation of Finishing Line 3 to incorporate the requirements contained in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 5: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR 201-6.4**

**Item 5.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All applicable conditions contained in the current Title V permit are still required to be followed, including the associated monitoring, recordkeeping, and reporting.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



DESCRIPTION  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-1: Non Applicable requirements**  
**Effective between the dates of 01/12/2016 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (g)**

**Item 1-1.1:**

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

(From Mod 1) 40 CFR Part 63, Subpart RRR  
Reason: No later than 180 days after the effective date of this permit, the owner or operator shall submit to the Environmental Protection Agency (with a copy to the Department) a request for an applicability determination for the scrap dryers.

If an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f), and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under this part) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the Administrator to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of this part for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under section 112, if any. The requirements to determine applicability of a standard under §63.1(b)(3) and to record the results of that



**New York State Department of Environmental Conservation**

Permit ID: 7-3556-00001/00108

Facility DEC ID: 7355600001



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 1-3.4:**

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 1-3.5:**

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 1-3.6:**

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

Emission Unit: 0-000CL

Emission Unit: N-PUSHR

Regulated Contaminant(s):

CAS No: 007664-93-9      SULFURIC ACID

**Item 1-3.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. Emissions of sulfuric acid mist from the CASH Lines (including all associated equipment, such as hot water generators) and pusher furnace No. 2 shall not exceed 6.9 tons in any 12 consecutive calendar month period.
2. The owner or operator shall measure and record the amount of sulfuric acid fed to each line on a daily basis.
3. No later than 180 days after commencing operation of Pusher 2 furnace, the effective date of this permit, the owner or operator shall submit to the Department a report detailing the results of sulfuric acid mist emissions testing conducted on one or more scrubber associated with the CASH lines. Testing shall be conducted in accordance with a protocol approved by the Department.



4. Emissions of sulfuric acid mist from the scrubbers associated with the CASH lines shall be computed using site-specific emission factors derived from the most recent stack test, as approved by the Department. The emission factor may be based on scrubber efficiency. Emissions from fuel combustion devices shall be computed based on Department-approved emission factors. A single emission factor (such as pounds per year) may be used for all combustion devices.

5. No later than 180 days after commencing operation of Pusher 2 furnace, the owner or operator shall submit to the Department a permit application for incorporation of emission limits to insure compliance with the annual sulfuric acid mist emissions cap. An application is not required if the applicant can demonstrate that unfettered emissions of sulfuric acid are less than 5.0 tons per year.

6. The owner or operator, on an annual basis, or no later than 30 days after becoming aware that emissions have exceeded the threshold stated in this condition, shall state whether he or she has complied with this requirement.

Parameter Monitored: SULFURIC ACID

Upper Permit Limit: 6.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2016.

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

**Condition 1-4: Capping Monitoring Condition**  
**Effective between the dates of 01/12/2016 and 09/29/2023**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 1-4.1:**

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 Subpart 231-8

**Item 1-4.2:**

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



**Item 1-4.3:**

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 1-4.4:**

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 1-4.5:**

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 1-4.6:**

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

Emission Unit: 0-000CL

Emission Unit: N-PUSHR

Regulated Contaminant(s):

CAS No: 0NY075-02-5 PM 2.5

**Item 1-4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. Emissions of PM<sub>2.5</sub> from the CASH Lines (including all associated equipment, such as hot water generators), pusher furnace No. 2 and the two scrap dryers shall not exceed 9.9 tons in any 12 consecutive calendar month period.
2. The owner or operator shall measure and record the amount of natural gas combusted in each device associated with the CASH lines and pusher furnace 2. The owner and operator shall record fuel use on a daily basis.
3. The owner or operator shall measure and record the production rate of each scrap dryer on a daily



basis.

4. No later than 180 days after commencing operation of pusher furnace No. 2, the owner or operator shall submit to the Department a report detailing the results of PM<sub>2.5</sub> emissions testing conducted on the scrap dryers. Testing shall be conducted in accordance with a protocol approved by the Department.

5. Emissions of PM<sub>2.5</sub> from the CASH lines, pusher furnace No. 2 and the scrap dryers shall be computed using site-specific emission factors derived from the most recent stack test, as approved by the Department, and Department-approved emission factors (such as vendor guarantees or EPA-published emission factors).

6. No later than 180 days after commencing operation of pusher furnace No. 2, the owner or operator shall submit to the Department a permit application for incorporation of emission limits and fuel or process monitoring requirements to insure compliance with the annual PM<sub>2.5</sub> emissions cap. An application is not required if the applicant can demonstrate that unfettered emissions of PM<sub>2.5</sub> are less than 8.5 tons per year.

7. The owner or operator, on an annual basis, or no later than 30 days after becoming aware that emissions have exceeded the threshold stated in this condition, shall state whether he or she has complied with this requirement.

Parameter Monitored: PM 2.5

Upper Permit Limit: 9.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2016.

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

**Condition 1-5: Capping Monitoring Condition**  
**Effective between the dates of 01/12/2016 and 09/29/2023**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 1-5.1:**

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 Subpart 231-6

6 NYCRR Subpart 231-8

**Item 1-5.2:**

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

**Item 1-5.3:**

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 1-5.4:**

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 1-5.5:**

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 1-5.6:**

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

Emission Unit: 0-000CL

Emission Unit: N-PUSHR

Regulated Contaminant(s):

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

**Item 1-5.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. Emissions of NO<sub>x</sub> from the CASH Lines (including all associated equipment, such as hot water generators), pusher furnace No. 2 and the two scrap dryers shall not exceed 39 tons in any 12 consecutive calendar month period.



2. The owner or operator shall measure and record the amount of natural gas combusted in each device associated with the CASH lines, pusher furnace No. 2 and the scrap dryers. The owner and operator shall record fuel use on a daily basis.
3. No later than 180 days after commencing operation of pusher furnace No. 2, the owner or operator shall submit to the Department a report detailing the results of NOx emissions testing conducted on the CASH lines annealing furnaces and pusher furnace No. 2. Testing shall be conducted in accordance with a protocol approved by the Department.
4. Emissions of NOx from the CASH lines, pusher furnace No. 2 and the scrap dryers shall be computed using site-specific emission factors derived from the most recent stack test, as approved by the Department. Emissions from all other fuel combustion devices shall be computed using Department-approved emission factors (such as vendor guarantees, EPA-published emission factors or site-specific emission factors).
5. No later than 180 days after commencing operation of pusher furnace No. 2, the owner or operator shall submit to the Department a permit application for incorporation of emission limits and fuel or process monitoring requirements to insure compliance with the annual NOx emissions cap.
6. The owner or operator, on an annual basis, or no later than 30 days after becoming aware that emissions have exceeded the threshold stated in this condition, shall state whether he or she has complied with this requirement.

Parameter Monitored: OXIDES OF NITROGEN  
Upper Permit Limit: 39 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 4/30/2016.  
Subsequent reports are due every 12 calendar month(s).

**Condition 1-6: Capping Monitoring Condition**  
**Effective between the dates of 01/12/2016 and 09/29/2023**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**New York State Department of Environmental Conservation**

Permit ID: 7-3556-00001/00108

Facility DEC ID: 7355600001



**Item 1-6.1:**

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 Subpart 231-8

**Item 1-6.2:**

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

**Item 1-6.3:**

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 1-6.4:**

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 1-6.5:**

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 1-6.6:**

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

Emission Unit: 0-000CL

Emission Unit: N-PUSHR

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

**Item 1-6.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. Emissions of carbon monoxide from the CASH Lines



(including all associated equipment, such as hot water generators), pusher furnace No. 2 and the two scrap dryers shall not exceed 99 tons in any 12 consecutive calendar month period.

2. The owner or operator shall measure and record the amount of natural gas combusted in each device associated with the CASH lines, pusher furnace No. 2 and the scrap dryers. The owner and operator shall record fuel use on a daily basis.

3. No later than 180 days after commencing operation of pusher furnace No. 2, the owner or operator shall submit to the Department a report detailing the results of CO emissions testing conducted on the CASH lines annealing furnaces and pusher furnace No. 2. Testing shall be conducted in accordance with a protocol approved by the Department.

4. Emissions of CO from the CASH lines and pusher furnace No. 2 shall be computed using site-specific emission factors derived from the most recent stack test, as approved by the Department. Emissions from all other fuel combustion devices shall be computed using Department-approved emission factors (such as vendor guarantees, EPA-published emission factors or site-specific emission factors).

5. No later than 180 days after commencing operation of pusher furnace No. 2, the owner or operator shall submit to the Department a permit application for incorporation of emission limits and fuel or process monitoring requirements to insure compliance with the annual CO emissions cap. An application is not required if the applicant can demonstrate that unfettered emissions of CO are less than 80 tons per year.

6. The owner or operator, on an annual basis, or no later than 30 days after becoming aware that emissions have exceeded the threshold stated in this condition, shall state whether he or she has complied with this requirement.

Parameter Monitored: CARBON MONOXIDE

Upper Permit Limit: 99 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2016.



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

**Condition 6: Capping Monitoring Condition**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 6.1:**

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 Subpart 231-8

**Item 6.2:**

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

**Item 6.3:**

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 6.4:**

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 6.5:**

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 6.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY075-02-5 PM 2.5

**Item 6.7:**

Compliance Demonstration shall include the following monitoring:

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



Should any piece of PM 2.5 control equipment, associated with this project, not be operating for any reason; an evaluation of the uncontrolled emissions must be conducted to ensure emissions from the project do not or will not equal or exceed the significance level of 10 tons per year of PM 2.5 on a 12-month rolling basis. The evaluation must be conducted within 2 business days of discovering such control equipment is not operating. Any exceedance of this level must be reported to the Department within 2 business days of discovering the exceedance. Evaluations conducted that do not result in an exceedance shall be reported in the facility's semi-annual monitoring report and annual compliance certification.

Parameter Monitored: PM 2.5

Upper Permit Limit: 9.9 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 7: Capping Monitoring Condition**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 7.1:**

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 Subpart 231-8

**Item 7.2:**

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

**Item 7.3:**

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 7.4:**

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.

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**Item 7.5:**

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 7.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

**Item 7.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Should any piece of PM-10 control equipment, associated with this project, not be operating for any reason; an evaluation of the uncontrolled emissions must be conducted to ensure emissions from the project do not or will not equal or exceed the significance level of 15 tons per year of PM-10 on a 12-month rolling basis. The evaluation must be conducted within 2 business days of discovering such control equipment is not operating. Any exceedance of this level must be reported to the Department within 2 business days of discovering the exceedance. Evaluations conducted that do not result in an exceedance shall be reported in the facility's semi-annual monitoring report and annual compliance certification.

Parameter Monitored: PM-10

Upper Permit Limit: 14.9 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 8: Capping Monitoring Condition**

**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 8.1:**

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 Subpart 231-8



**Item 8.2:**

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

**Item 8.3:**

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 8.4:**

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 8.5:**

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 8.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 8.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Should any piece of particulate matter control equipment, associated with this project, not be operating for any reason; an evaluation of the uncontrolled emissions must be conducted to ensure emissions from the project do not or will not equal or exceed the significance level of 25 tons per year of particulate matter on a 12-month rolling basis. The evaluation must be conducted within 2 business days of discovering such control equipment is not operating. Any exceedance of this level must be reported to the Department within 2 business days of discovering the exceedance. Evaluations conducted that do not result in an exceedance shall be reported in the facility's semi-annual monitoring report and annual compliance certification.



Parameter Monitored: PARTICULATES  
Upper Permit Limit: 24.9 tons per year  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR Subpart 202-1**

**Item 9.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

In addition to the performance testing already contained in this permit, the following sources shall be tested for NOx emissions in support of stated emission factors used in the permit application:

for finishing Lines 1, 2, and 3;  
Annealing Furnaces  
Reheaters  
Hot water Generators

These tests shall be conducted within 60 days of reaching full production of the last line completed or within 180 days of startup of the last line completed, whichever is sooner.

Also;  
The scrap dryers

These tests shall be conducted within 60 days of reaching full production or within 180 days of startup, whichever is sooner.

The Department may grant an alternative test schedule if a demonstration is made that testing in accordance with the above stated schedule would result in operating conditions that would not be representative of normal operations. An extension may also be granted if the Department finds there is a reasonable justification to coordinate the test



with other required testing at the facility. The facility owners or operators must make such requests in writing at least 30 days prior to the date required to meet the above stated schedule.

For multiple similar sources, the Department may allow the test of a single source if a demonstration can be made that the source is representative of the group.

Testing and reporting shall be conducted in accordance with the provisions of 6 NYCRR Part 202-1. The Department reserves the right to require additional testing at any time.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 10: Air pollution prohibited**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 10.1:**

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 12: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

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

**Item 12.1:**

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

Emission Unit: 0-000CL  
Process: CL1

Emission Point: 01TRM  
Emission Source: C1TRM

Emission Unit: 0-000CL  
Process: CL1

Emission Point: 01TRM  
Emission Source: TRM1P

Emission Unit: 0-000CL  
Process: CL2

Emission Point: 02TRM  
Emission Source: C2TRM

Emission Unit: 0-000CL

Emission Point: 02TRM

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Process: CL2 Emission Source: TRM2P

Emission Unit: 0-000CL Emission Point: 03TRM  
Process: CL3 Emission Source: C3TRM

Emission Unit: 0-000CL Emission Point: 03TRM  
Process: CL3 Emission Source: TRM3P

Emission Unit: N-PUSHR Emission Point: PUSH2  
Process: PF2 Emission Source: PUSH2

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

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Lines 1, 2, and 3 trimmers with cyclones and new pusher furnace (after initial test).

In instances where determination of permissible emission rate using process weight is not applicable 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. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected. These instances shall be reported to the Department within 2 business days of discovering the possible excess emissions. A written report of describing any of these instances and corrective actions must be submitted to the Department within 30 days of discovery. Information in regard to this permit condition shall also be reported in the required semi-annual monitoring report and the annual compliance certification.

Records of these verifications, investigations and corrective actions will be kept on-site.

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Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 14: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 14.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-000CL Process: CL1	Emission Point: 01SCR Emission Source: C1CON
Emission Unit: 0-000CL Process: CL1	Emission Point: 01SCR Emission Source: C1CTR
Emission Unit: 0-000CL Process: CL1	Emission Point: 01SCR Emission Source: C1PCL
Emission Unit: 0-000CL Process: CL1	Emission Point: 01TRM Emission Source: C1TRM
Emission Unit: 0-000CL Process: CL1	Emission Point: 01TRM Emission Source: TRM1P
Emission Unit: 0-000CL Process: CL2	Emission Point: 02SCR Emission Source: C2CON
Emission Unit: 0-000CL Process: CL2	Emission Point: 02SCR Emission Source: C2CTR
Emission Unit: 0-000CL Process: CL2	Emission Point: 02SCR Emission Source: C2PCL
Emission Unit: 0-000CL Process: CL2	Emission Point: 02TRM Emission Source: C2TRM



Emission Unit: 0-000CL Process: CL2	Emission Point: 02TRM Emission Source: TRM2P
Emission Unit: 0-000CL Process: CL3	Emission Point: 03SCR Emission Source: C3CON
Emission Unit: 0-000CL Process: CL3	Emission Point: 03SCR Emission Source: C3CTR
Emission Unit: 0-000CL Process: CL3	Emission Point: 03SCR Emission Source: C3PCL
Emission Unit: 0-000CL Process: CL3	Emission Point: 03TRM Emission Source: C3TRM
Emission Unit: 0-000CL Process: CL3	Emission Point: 03TRM Emission Source: TRM3P
Emission Unit: N-PUSHR Process: PF2	Emission Point: PUSH2 Emission Source: PUSH2

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Lines 1, 2, and 3 trimmers with cyclones; lines 1, 2, and 3 surface prep sources with scrubbers and demisters; and new pusher furnace (after initial test).

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions from the emission sources contained in this permit. The following monitoring and reporting procedure shall be followed:

1. If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this may be zero percent opacity for many or all stacks), the facility owner shall determine the cause immediately and make the necessary correction. The facility owner and/or operator will observe emissions from all applicable emission sources daily during daylight hours to monitor for unusual opacity conditions. The records of these observations will be recorded in a bound log book at the facility and shall be available for inspection by Department representatives upon request. Records will be



maintained for a period of at least five years.

2. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the facility owner will conduct a Method 9 assessment to determine the degree of opacity.
3. If the opacity is determined to exceed the limits of section 212.6(a), the facility will be determined to be in violation, will remedy the problem, and will contact the Department. The provisions of Part 201-1.4 and 201-6.4(c)(3)(ii) shall apply.
4. The Department also reserves the right to perform or require the performance of a Method 9 opacity evaluation.
5. Method 9 observation data and a summary of daily observations must be included in the facility's semi-annual monitoring report.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: EPA Method 9  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable Federal Requirement: 6 NYCRR 227-1.3**

**Item 16.1:**

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

Emission Unit: 0-000CL Process: CL1	Emission Point: 01FCE Emission Source: C1FCE
Emission Unit: 0-000CL Process: CL2	Emission Point: 02FCE Emission Source: C2FCE
Emission Unit: 0-000CL Process: CL3	Emission Point: 03FCE Emission Source: C3FCE

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

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



Monitoring Description:

Line 1, 2, and 3 annealing furnaces

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

An initial performance test shall be conducted on each annealing furnace. These tests shall be conducted within 60 days of reaching full production of the last line completed or within 180 days of startup of the last line completed, whichever is sooner. The Department may grant an alternative test schedule if a demonstration is made that testing in accordance with the above stated schedule would result in operating conditions that would not be representative of normal operations. An extension may also be granted if the Department finds there is a reasonable justification to coordinate the test with other required testing at the facility. The facility owners or operators must make such requests in writing at least 30 days prior to the date required to meet the above stated schedule. Tests shall be performed and reported in accordance with 6 NYCRR Part 202-1.

Subsequent to the initial performance tests, compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions from the emission sources contained in this permit. The following monitoring and reporting procedure shall be followed:

1. If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this may be zero percent opacity for many or all stacks), the facility owner shall determine the cause immediately and make the necessary correction. The facility owner and/or operator will observe emissions from all applicable emission sources daily during daylight hours to monitor for unusual opacity conditions. The records of these observations will be recorded in a bound log book at the facility and shall be available for inspection by Department representatives upon request. Records will be maintained for a period of at least five years.
2. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the facility owner will conduct a Method 9 assessment to determine the degree of opacity.
3. If the opacity is determined to exceed the limits of

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section 212.6(a), the facility will be determined to be in violation, will remedy the problem, and will contact the Department. The provisions of Part 201-1.4 and 201-6.4(c)(3)(ii) shall apply.

4. The Department also reserves the right to perform or require the performance of a Method 9 opacity evaluation.

5. Method 9 observation data and a summary of daily observations must be included in the facility's semi-annual monitoring report.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

**Condition 1-7: Compliance Demonstration**

**Effective between the dates of 01/12/2016 and 09/29/2023**

**Applicable Federal Requirement:40CFR 63, Subpart RRR**

**Item 1-7.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-000CL

Process: SDR

**Item 1-7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No later than 180 days after the effective date of this permit the owner or operator shall submit to the EPA, with a copy to the DEC, a request for a determination of applicability of the scrap dryers to the secondary aluminum MACT standard, 40 CFR Part 63, Subpart RRR.

A copy of the EPA's response shall be forwarded to the DEC.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-8: Compliance Demonstration**  
Effective between the dates of 01/12/2016 and 09/29/2023

**Applicable Federal Requirement: 6 NYCRR 227-2.4 (g)**

**Item 1-8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: N-PUSHR

Process: PF2

Emission Source: PUSH2

**Item 1-8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

1. No later than 180 days after the effective date of this permit, the owner and operator shall submit to the Department an analysis of NOx emission control systems.
2. The analysis shall include quotes from at least three equipment vendors for the turn-key installation of selective catalytic reduction (SCR) on the pusher furnace exhaust. The vendors shall have experience in installing SCR on small flue gas installations, and shall include both ammonia and urea installations. The installation shall include temperature profiles and NOx emissions data from the pusher furnace.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**  
**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

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

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

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

**Condition 27: Contaminant List**  
**Effective between the dates of 09/30/2013 and 09/29/2023**





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

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

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 29: Emission Unit Definition**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

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

**Item 29.1(From Mod 1):**

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

Emission Unit: 0-000CL

Emission Unit Description:

This Emission Unit consists of three aluminum finishing lines designed to meet product specifications. The operations involved in each line include: annealing, surface preparation, and other mechanical processes.

Building(s): CL

**Item 29.2(From Mod 1):**

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

Emission Unit: N-PUSHR

Emission Unit Description:

New Pusher furnace (PUSH2) for preheating ingots prior to rolling.

Building(s): INGOT PREP

**Condition 30: Renewal deadlines for state facility permits**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

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

**Item 30.1:**

The owner or operator of a facility having an issued state facility permit shall submit a complete

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application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Condition 31: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

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

**Item 31.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 31.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 7  
615 Erie Blvd West  
Syracuse, NY 13204

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 32: Visible Emissions Limited**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 32.1:**

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

**Condition 1-9: Compliance Demonstration**  
**Effective between the dates of 01/12/2016 and 09/29/2023**

**Applicable State Requirement:6 NYCRR 212-2.1**

**Item 1-9.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 1-9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



This facility is subject to 6 NYCRR Part 212. This condition is applicable to non-criteria air contaminants as defined in 6 NYCRR 212-1.2(b), emitted from all process sources at the facility.

1. No later than 270 days after the effective date of this permit, the owner or operator shall submit to the Department a list of all emission sources (that are not trivial or exempt under 6 NYCRR 201-3) and, for each contaminant emitted from each emission source,

i. the actual emission rate, in pounds per hour;

ii. the emission rate potential, as defined in 6 NYCRR 200.1, in pounds per hour;

iii. a proposed environmental rating. The initial environmental rating for each contaminant will be based on the Department's most recent AGC/SGC Tables, where high toxicity contaminants will be considered "A" rated, moderate toxicity contaminants "B" rated, and low toxicity contaminants "C" rated. Those contaminants without a toxicity classification in the AGC/SGC table will be assigned a B rating.

iv. any annual or short-term air dispersion modeling analysis done to predict off-site air concentrations to further support the proposed air contaminants' environmental rating;

v. for each High Toxicity Air Contaminant listed in 6 NYCRR 212-2.2 Table 2, the actual emissions, in pounds per year, so that facility-wide actual emissions are determined; and

vi. supporting calculations.

2. For each HTAC with a facility-wide actual emission rate less than the corresponding mass emission limit stated in 6 NYCRR 212-2.2, Table 2, no further review is required.

3. For those contaminants with a facility-wide actual emission rate in excess of the mass emission limit stated in 6 NYCRR 212-2.2, Table 2, and for all other non-criteria air contaminants, the facility shall comply with the emission reductions specified in 6 NYCRR 212-2.3(b), Table 4, except as provided by Item 5 of this condition (regarding contaminants subject to a federal standard under 40 CFR Parts 60, 61 and 63) and Item 6 (regarding process emissions sources that are exempt).



i. For those contaminants identified in Item 1 of this condition, except those that satisfy Item 2 (HTACs with actual emissions less than the mass emission thresholds in 6 NYCRR 212-2.2 Table 2), the owner or operator shall state, for each process source with a contaminant(s) having an emission rate potential equal to or greater than 0.1 lb/hr for A-rated contaminants or 10 lb/hr for all other contaminants, whether the emission rate is compliant with 6 NYCRR 212-2.3(b), Table 4. The owner shall state the method of control and the method used to determine compliance.

ii. The contaminants identified in Item 1 of this condition with an emission rate potential from a process emission source that is less than 0.1 lb/hr, except those that satisfy Item 2, shall not be emitted at a rate that results in a predicted ambient concentration in excess of the Annual Guideline Concentration or Short term Guideline Concentration, or any interim AGC or SGC.

(a) A facility-wide toxic impact assessment must be completed using Department-approved modeling procedures. No later than 210 days after the effective date of this permit, the owner or operator must submit to the Department a modeling protocol for the impact assessment. No later than 90 days after the Department's approval of the protocol, the owner or operator shall submit to the Department a report describing the results of this impact assessment.

(b) No later than 90 days after the Department's approval of the modeling protocol, for each contaminant for which the impact assessment predicts ambient impacts in excess of the AGC or SGC, the owner or operator shall submit to the Department a plan to reduce emissions (or otherwise reduce predicted ambient impacts) from one or more process emission sources such that predicted ambient impacts of facility-wide emissions are below the AGC and SGC.

4.i. For each contaminant with an emission rate potential from a process emission source greater than or equal to 0.1 lb/hr that does not comply with the specified emission reductions in 6 NYCRR 212-2.3(b), the owner or operator shall submit to the Department, no later than 180 days after the effective date of this permit:

(a) a plan to meet the emission reduction specified in 6 NYCRR 212-2.3(b), or

(b) a toxic BACT (T-BACT) analysis, as described in 6 NYCRR 212-1.2.



ii. Not later than one year after the effective date of this permit, the owner or operator shall comply with 6 NYCRR 212-2.3(b) or install T-BACT.

5.i. A process emission source subject to a standard under 40 CFR Part 60 satisfies the requirements of this condition for the respective air contaminant if the facility demonstrates that it is in compliance with that relevant 40 CFR Part 60 standard.

ii. A process emission source subject to a standard under 40 CFR Part 61 or Part 63 satisfies the requirements of this condition for the respective air contaminant if the facility demonstrates that it is in compliance with that relevant 40 CFR Part 61 or Part 63 standard and, for those federal standards regulating HTACs, provides a Toxic Impact Assessment (TIA) demonstrating that the predicted maximum off-site ambient concentration is less than the AGC and SGC and that emissions are less than the Persistent and Bioaccumulative Trigger as defined in 6 NYCRR 212.

6. The Department assigns final Environmental Ratings to contaminants, and reserves the right to change any initial environmental rating proposed by the facility owner or operator. Process emission sources that meet the exemptions in 6 NYCRR 212-1.4 are not subject to this condition. Process emission sources that emit VOCs that would be exempt if not A-rated must conduct an ambient impact analysis as directed in Item 3.ii of this condition to support the proposed environmental rating.

7. On an annual basis, the owner or operator shall submit to the Department a report stating whether any changes were made to the operation of these emission sources, or the air pollution control equipment, that could result in increases in emissions or increases in predicted ambient concentrations.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 33: Compliance Demonstration**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable State Requirement:6 NYCRR 212.4 (b)**

**Item 33.1:**

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

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Emission Unit: 0-000CL  
Process: CL1

Emission Source: C1RLB

Emission Unit: 0-000CL  
Process: CL1

Emission Source: RLB1P

Emission Unit: 0-000CL  
Process: CL2

Emission Source: C2RLB

Emission Unit: 0-000CL  
Process: CL2

Emission Source: RLB2P

Emission Unit: 0-000CL  
Process: CL3

Emission Source: C3RLB

Emission Unit: 0-000CL  
Process: CL3

Emission Source: RLB3P

**Item 33.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Reluber on each finishing line

The demister associated with the reluber operations on each finishing line (1, 2, and/or 3) must be operating while any of the reluber emission source is operating on that particular line.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2013.

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

**Condition 34: Compliance Demonstration**

**Effective between the dates of 09/30/2013 and 09/29/2023**

**Applicable State Requirement:6 NYCRR 212.4 (b)**

**Item 34.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-000CL  
Process: CL1

Emission Point: 01SCR  
Emission Source: C1CON

Emission Unit: 0-000CL  
Process: CL1

Emission Point: 01SCR  
Emission Source: C1CTR

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Emission Unit: 0-000CL  
Process: CL1

Emission Point: 01SCR  
Emission Source: C1PCL

Emission Unit: 0-000CL  
Process: CL2

Emission Point: 02SCR  
Emission Source: C2CON

Emission Unit: 0-000CL  
Process: CL2

Emission Point: 02SCR  
Emission Source: C2CTR

Emission Unit: 0-000CL  
Process: CL2

Emission Point: 02SCR  
Emission Source: C2PCL

Emission Unit: 0-000CL  
Process: CL3

Emission Point: 03SCR  
Emission Source: C3CON

Emission Unit: 0-000CL  
Process: CL3

Emission Point: 03SCR  
Emission Source: C3CTR

Emission Unit: 0-000CL  
Process: CL3

Emission Point: 03SCR  
Emission Source: C3PCL

Regulated Contaminant(s):

CAS No: 007664-39-3

HYDROGEN FLUORIDE

**Item 34.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Chemical Treatment on each finishing line

The scrubber and demister associated with the chemical treatment operations on each finishing line (1, 2, and/or 3) must be operating while any of the chemical treatment sources (cleaner, surface prep, and/or applicator) are operating on that particular line.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2013.

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

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

**Condition 35: Emission Point Definition By Emission Unit**  
**Effective between the dates of 09/30/2013 and 09/29/2023**

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

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**Item 35.1(From Mod 0):**

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

Emission Unit: 0-000CL

Emission Point: 01FCE

Height (ft.): 80 Diameter (in.): 35  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: CL

Emission Point: 01SCR

Height (ft.): 80 Diameter (in.): 24  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: CL

Emission Point: 01TRM

Height (ft.): 85 Diameter (in.): 144  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: CL

Emission Point: 02FCE

Height (ft.): 80 Diameter (in.): 35  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: CL

Emission Point: 02SCR

Height (ft.): 80 Diameter (in.): 24  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: CL

Emission Point: 02TRM

Height (ft.): 85 Diameter (in.): 144  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: CL

Emission Point: 03FCE

Height (ft.): 83 Diameter (in.): 32  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: CL

Emission Point: 03SCR

Height (ft.): 80 Diameter (in.): 24  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: CL

Emission Point: 03TRM

Height (ft.): 85 Diameter (in.): 144  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: CL

**Item 35.2(From Mod 0):**

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

Emission Unit: N-PUSHR

Emission Point: PUSH2

Height (ft.): 99 Diameter (in.): 71  
NYTMN (km.): 4816.332 NYTME (km.): 382.348 Building: INGOT PREP

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

**Effective between the dates of 09/30/2013 and 09/29/2023**



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

**Item 36.1(From Mod 1):**

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

Emission Unit: 0-000CL

Process: CL1

Source Classification Code: 3-04-001-99

**Process Description:**

Process CL1 consists of various combustion and process emission sources associated with aluminum finishing operations. The finishing operations included in process CL1 include annealing, surface preparation, and other mechanical processes. The annealing furnace (C1FCE) utilizes low-NOx burners. Furnace emissions shall pass through a recuperator, which provides an energy benefit. Emissions (Non-VOC) from the surface preparation (C1CON), cleaning (C1PCL), and applicator (C1CTR) emission sources are directed through a common wet scrubber with a demister (SCR1P). Scrap from the trimmer (C1TRM) is directed to a cyclone (TRM1P) and directed into scrap boxes. The reluber (C1RLB) is used to apply lubrication to the sheet at the end of the process. Emissions from the reluber are directed to a demister (RLB1P) and vented inside the building. This process also includes three hot water generators and one reheat furnace that were previously exempt from the permitting requirements provided in 6 NYCRR Part 201.

Emission Source/Control: C1FCE - Combustion  
Design Capacity: 20.2 million Btu per hour

Emission Source/Control: C1HW1 - Combustion  
Design Capacity: 4 million Btu per hour

Emission Source/Control: C1HW2 - Combustion  
Design Capacity: 4 million Btu per hour

Emission Source/Control: C1HW3 - Combustion  
Design Capacity: 4 million Btu per hour

Emission Source/Control: RLB1P - Control  
Control Type: MIST ELIMINATOR

Emission Source/Control: SCR1P - Control  
Control Type: WET SCRUBBER

Emission Source/Control: TRM1P - Control  
Control Type: CENTRIFUGAL

Emission Source/Control: C1CON - Process



Emission Source/Control: C1CTR - Process

Emission Source/Control: C1PCL - Process

Emission Source/Control: C1RLB - Process

Emission Source/Control: C1TRM - Process

**Item 36.2(From Mod 1):**

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

Emission Unit: 0-000CL

Process: CL2

Source Classification Code: 3-04-001-99

**Process Description:**

Process CL2 consists of various combustion and process emission sources associated with aluminum finishing operations. The finishing operations included in process CL2 include annealing, surface preparation, and other mechanical processes. The annealing furnace (C2FCE) utilizes low-NOx burners. Furnace emissions shall pass through a recuperator, which provides an energy benefit. Emissions (Non-VOC) from the surface preparation (C2CON), cleaning (C2PCL), and applicator (C2CTR) emission sources are directed through a common wet scrubber with a demister (SCR2P). Scrap from the trimmer (C2TRM) is directed to a cyclone (TRM2P) and directed into scrap boxes. The reluber (C2RLB) is used to apply lubrication to the sheet at the end of the process. Emissions from the reluber are directed to a demister (RLB2P) and vented inside the building. This process also includes three hot water generators that are exempt from the permitting requirements provided in 6 NYCRR Part 201.

Emission Source/Control: C2FCE - Combustion  
Design Capacity: 20.2 million British thermal units

Emission Source/Control: C2HW1 - Combustion  
Design Capacity: 4 million Btu per hour

Emission Source/Control: C2HW2 - Combustion  
Design Capacity: 4 million Btu per hour

Emission Source/Control: C2HW3 - Combustion  
Design Capacity: 4 million Btu per hour

Emission Source/Control: RLB2P - Control  
Control Type: MIST ELIMINATOR

Emission Source/Control: SCR2P - Control  
Control Type: WET SCRUBBER

Emission Source/Control: TRM2P - Control



Control Type: CENTRIFUGAL

Emission Source/Control: C2CON - Process

Emission Source/Control: C2CTR - Process

Emission Source/Control: C2PCL - Process

Emission Source/Control: C2RLB - Process

Emission Source/Control: C2TRM - Process

**Item 36.3(From Mod 1):**

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

Emission Unit: 0-000CL

Process: CL3

Source Classification Code: 3-04-001-99

Process Description:

Process CL3 consists of various combustion and process emission sources associated with aluminum finishing operations. The finishing operations included in process CL3 include annealing, surface preparation, and other mechanical processes. The annealing furnace (C3FCE) utilizes low-NO<sub>x</sub> burners. Furnace emissions shall pass through a recuperator, which provides an energy benefit. Emissions (Non-VOC) from the surface preparation (C3CON), cleaning (C3PCL), and applicator (C3CTR) emission sources are directed through a common wet scrubber with a demister (SCR3P). Scrap from the trimmer (C3TRM) is directed to a cyclone (TRM3P) and directed into scrap boxes. The reluber (C3RLB) is used to apply lubrication to the sheet at the end of the process. Emissions from the reluber are directed to a demister (RLB3P) and vented inside the building. This process also includes three hot water generators that are exempt from the permitting requirements provided in 6 NYCRR Part 201.

Emission Source/Control: C3FCE - Combustion  
Design Capacity: 32.4 million Btu per hour

Emission Source/Control: C3HW1 - Combustion  
Design Capacity: 25 million Btu per hour

Emission Source/Control: C3HW2 - Combustion  
Design Capacity: 4 million Btu per hour

Emission Source/Control: C3HW3 - Combustion  
Design Capacity: 4 million Btu per hour

Emission Source/Control: RLB3P - Control  
Control Type: MIST ELIMINATOR



Emission Source/Control: SCR3P - Control  
Control Type: WET SCRUBBER

Emission Source/Control: TRM3P - Control  
Control Type: CENTRIFUGAL

Emission Source/Control: C3CON - Process

Emission Source/Control: C3CTR - Process

Emission Source/Control: C3PCL - Process

Emission Source/Control: C3RLB - Process

Emission Source/Control: C3TRM - Process

**Item 36.4(From Mod 1):**

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

Emission Unit: 0-000CL

Process: SDR

Source Classification Code: 3-04-001-99

Process Description:

The scrap dryers remove moisture from automotive scrap prior to processing in Recycle 1 furnaces F and G. The scrap ranges from 1" by 1" to 4" by 18." The scrap can be fed directly to the furnace or stored.

Emission Source/Control: SDRYP - Control  
Control Type: WET SCRUBBER

Emission Source/Control: SDRY2 - Process  
Design Capacity: 6 million Btu per hour

Emission Source/Control: SDRY3 - Process  
Design Capacity: 6 million Btu per hour

**Item 36.5(From Mod 1):**

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

Emission Unit: N-PUSHR

Process: PF2

Source Classification Code: 3-04-001-60

Process Description:

The pusher furnace PUSH2 is used to preheat aluminum ingots prior to rolling.

Emission Source/Control: PUSH2 - Process  
Design Capacity: 95 million Btu per hour

