



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 8-2614-00888/00001
Effective Date: 11/15/2012 Expiration Date: 11/14/2017

Permit Issued To: ROCHESTER SILVER WORKS LLC
681 W RIDGE RD
ROCHESTER, NY 14652

Contact: WILLIAM D STEWART
ROCHESTER SILVER WORKS LLC
1669 LAKE AVE BLDG 110
ROCHESTER, NY 14652-3639
(585) 477-6434

Facility: ROCHESTER SILVER WORKS
EASTMAN BUSINESS PARK|BUILDINGS 101, 110, 117, 138, 143, 144,
145, & 156
ROCHESTER, NY 14652

Contact: WILLIAM D STEWART
ROCHESTER SILVER WORKS LLC
1669 LAKE AVE BLDG 110
ROCHESTER, NY 14652-3639
(585) 477-6434

Description:
Renewal of Initial Title V Facility Permit, for existing Rochester Silver Works silver nitrate production and silver recovery processes, formerly operated by Eastman Kodak Company, occurring in eight Buildings in Eastman Business Park, Buildings 101, 110, 117, 138, 143, 144, 145, and 156.

These operations are subject to Title V regulations due to potential emissions of individual HAP compounds greater than 10 tons per year each, potential total HAP emissions greater than 25 tons per year, and potential emissions of NO_x, PM, PM-10, SO₂, and VOC above 100 tons per year each.

Rochester Silver Works is also a major facility as defined in 40 CFR 52.21 Prevention of Significant Deterioration due to potential emissions of NO_x, PM, PM-10, SO₂, HAP, and VOC above 250 tons per year each.

This permit maintains three variances approved previously when the processes were run by Kodak:



A Part 212.10 VOC RACT variance, specified in condition 56, with a 30.02 tons per year limit on VOC emissions from the Cowles Washers, a caustic process which recovers silver film emulsion from film scrap;

A Part 212.4(a) BACT variance, specified in condition 73, limiting Cowles Washer emissions of dichloromethane, acetone, butanol, and cyclohexane to a total of 37.04 tons per year and the A-rated HAP dichloromethane to a total of 3.14 tons per year; and

A Part 212.10 NO_X RACT and 40 CFR 52 PSD variance, specified in condition 45, with a 10.5 ton per year limit on NO_X emissions from the Silver Roaster, which burns off the extracted film emulsion to produce a silver-rich ash for further refining.

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: SCOTT SHEELEY
 NYS DEC
 6274 E AVON-LIMA RD
 AVON, NY 14414

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

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



DEC GENERAL CONDITIONS

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

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 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 to the Department for approval.



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 8 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 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: ROCHESTER SILVER WORKS LLC
681 W RIDGE RD
ROCHESTER, NY 14652

Facility: ROCHESTER SILVER WORKS
EASTMAN BUSINESS PARK|BUILDINGS 101, 110, 117, 138, 143, 144,
145, & 156
ROCHESTER, NY 14652

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

Permit Effective Date: 11/15/2012

Permit Expiration Date: 11/14/2017



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.5 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 16 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 17 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 18 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 19 6 NYCRR 202-1.1: Required Emissions Tests
- 20 40 CFR Part 68: Accidental release provisions.
- 21 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 22 6 NYCRR Subpart 201-6: Emission Unit Definition
- 23 6 NYCRR 201-6.5 (f): Compliance Certification
- 24 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 25 6 NYCRR Part 207: Submittal of Episode Action Plans
- 26 6 NYCRR 211.1: Air pollution prohibited
- 27 6 NYCRR 231-11.2 (b): Compliance Certification
- 28 40CFR 61, NESHAP Subpart M: National Emission Standard for Asbestos
- 29 40 CFR 64.7: Compliance Certification
- 30 40 CFR 64.8: Compliance Certification
- 31 40 CFR 64.9: Compliance Certification

Emission Unit Level

- 32 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 33 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=F-AC001

- 34 6 NYCRR Part 226: Compliance Certification

EU=U-00019,Proc=H39,ES=143AA

- 35 6 NYCRR 212.10 (c) (3): Compliance Certification
- 36 6 NYCRR 212.10 (c) (3): Compliance Certification

EU=U-00019,EP=14303,Proc=H39,ES=143AB



- 37 6 NYCRR 212.4 (c): Compliance Certification
- 38 6 NYCRR 212.6 (a): Compliance Certification
- 39 6 NYCRR 212.4 (c): Compliance Certification
- 40 6 NYCRR 212.6 (a): Compliance Certification

EU=U-00063,EP=10105,Proc=H31,ES=101AB

- 41 6 NYCRR 212.4 (c): Compliance Certification
- 42 6 NYCRR 212.4 (c): Compliance Certification
- 43 6 NYCRR 212.6 (a): Compliance Certification

EU=U-00063,EP=101A2,Proc=H29,ES=101AJ

- 44 6 NYCRR 212.4 (c): Compliance Certification
- 45 6 NYCRR 212.10 (c) (3): Compliance Certification
- 46 6 NYCRR 212.10 (c) (4) (i): Compliance Certification
- 47 40CFR 52.21, Subpart A: Compliance Certification
- 48 40CFR 52.21, Subpart A: Compliance Certification
- 49 40CFR 52.21, Subpart A: Compliance Certification
- 50 40CFR 52.21, Subpart A: Compliance Certification

EU=U-00063,EP=101A3,Proc=H29

- 51 6 NYCRR 212.6 (a): Compliance Certification

EU=U-00063,EP=101A3,Proc=H29,ES=101AI

- 52 6 NYCRR 212.4 (c): Compliance Certification

EU=U-00063,EP=11002,Proc=H33,ES=110AC

- 53 6 NYCRR 212.10 (c) (3): Compliance Certification
- 54 6 NYCRR 212.4 (c): Compliance Certification
- 55 6 NYCRR 212.6 (a): Compliance Certification

EU=U-00078,EP=110C6,Proc=H38,ES=110AQ

- 56 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification

EU=U-00078,EP=110D0,Proc=H43,ES=110AU

- 57 6 NYCRR 212.4 (c): Compliance Certification

EU=U-00078,EP=110D1,Proc=H43,ES=110AV

- 58 6 NYCRR 212.4 (c): Compliance Certification

EU=U-00078,EP=110D2,Proc=H43,ES=110AW

- 59 6 NYCRR 212.4 (c): Compliance Certification

EU=U-00078,EP=110D3,Proc=H43,ES=110AX

- 60 6 NYCRR 212.4 (c): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 61 ECL 19-0301: Contaminant List
- 62 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 63 6 NYCRR 211.2: Visible Emissions Limited
- 64 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



65 6 NYCRR 212.5 (d): Less restrictive permissible emission rate possible if BACT applied

66 6 NYCRR 231-11.2 (c): Compliance Demonstration

Emission Unit Level

EU=U-00063,EP=101A1,Proc=H34,ES=110AE

67 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-00063,EP=101A2,Proc=H29,ES=101AJ

68 6 NYCRR 212.4 (a): Compliance Demonstration

69 6 NYCRR 212.4 (a): Compliance Demonstration

70 6 NYCRR 212.4 (a): Compliance Demonstration

71 6 NYCRR 212.4 (a): Compliance Demonstration

72 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-00078,EP=110C6,Proc=H38,ES=110AQ

73 6 NYCRR 212.4 (a): Compliance Demonstration



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

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

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

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



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.3 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR 201-6.3 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.5 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.5 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5 (a) (6)

This permit does not convey any property rights of any sort or any exclusive privilege.



Item I: Severability - 6 NYCRR 201-6.5 (a) (9)

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

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

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

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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



(NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:
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.

Condition 2: Fees
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (7)

Item 2.1:
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (c)

Item 3.1:



The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c) (2)

Item 4.1:

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 5: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification 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 201-6.3(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 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.



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

Condition 6: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 201-6.5 (e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification 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.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



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:

6274 East Avon-Lima Road
Avon, NY 14414-9519

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 1/30/2013.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway,



Albany NY 12233-3251

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires - Prohibitions
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

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

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.



- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

**Condition 10: Maintenance of Equipment
Effective between the dates of 11/15/2012 and 11/14/2017**

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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

**Condition 11: Recycling and Salvage
Effective between the dates of 11/15/2012 and 11/14/2017**

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

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 the



ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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.

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 13.1:

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 this Subpart. 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 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.

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 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.

Condition 15: Standard Requirement - Provide Information

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (d) (5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (f) (6)

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this



Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 20: Accidental release provisions.
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:40 CFR Part 68

Item 20.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



8400 Corporate Dr
Carrollton, Md. 20785

Condition 21: Recycling and Emissions Reduction
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:40CFR 82, Subpart F

Item 21.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

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

Condition 22: Emission Unit Definition
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 22.1:

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

Emission Unit: F-AC001

Emission Unit Description:

FACILITY EMISSION UNIT FOR SOLVENT METAL
PARTS CLEANERS, AND ASSOCIATED FUGITIVE
EMISSIONS.

Building(s): 101

Item 22.2:

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

Emission Unit: U-00019

Emission Unit Description:

SILVER FLOW SILVER NITRATE OPERATIONS AND
ASSOCIATED FUGITIVE EMISSIONS

Building(s): 143

Item 22.3:

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

Emission Unit: U-00063

Emission Unit Description:

SILVER FLOW SMELTER AND ROASTER, AND
ASSOCIATED FUGITIVE EMISSIONS

Building(s): 101
110



Item 22.4:

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

Emission Unit: U-00078

Emission Unit Description:

SILVER FLOW WATER TREATMENT OPERATIONS,
AND ASSOCIATED FUGITIVE EMISSIONS

Building(s): 110
156

Condition 23: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 201-6.5 (f)

Item 23.1:

The Compliance Certification activity will be performed for the Facility.

Item 23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

I. Protocol Objective

The objective of this condition is to maximize operational flexibility for the facility by building into the Title V Permit the capability to make certain changes using a protocol. As provided under 6 NYCRR Part 201-6.5(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.7.

II. Applicability

A. The following types of changes may be reviewed under this protocol, except as prohibited under II.B or III.A.c below:

1. New emission sources,
2. 6 NYCRR Part 200 "modifications",
3. Emission point relocations, and
4. Changes that otherwise could be handled under the minor permit modification process in 6 NYCRR Part 201-6.7.

B. This protocol does not apply to the following changes:

1. Any project defined as major in 6NYCRR 621.4(g);



2. Any significant permit modification as that term is defined in 6 NYCRR 201-6.7(d); or
3. Any change that would exceed the emissions allowable under the permit whether expressed as a rate or in terms of total emissions.

III. Protocol

A. Criteria

1. The facility shall evaluate changes reviewed under this protocol in accordance with the following criteria:

a. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. The new or changed source will be associated with an existing emissions unit, process, emission source or emission point that has the necessary regulatory citations. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or, subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

b. Any new or changed emission source shall not be part of a source project that results in a significant net emissions increase that exceeds the NSR thresholds identified in 6 NYCRR Part 231-2 or 40 CFR 52.21. The facility will submit documentation of major NSR program non-applicability for NYSDEC review and approval consistent with the advance notification provisions of Section III.B. below.

c. The facility shall not use the protocol to make physical changes or changes in the method of operation of existing emission sources that would require a new federally enforceable cap either to avoid major New Source Review requirements or to address and comply with other Clean Air Act requirements such as RACT. Such changes must be addressed via the significant permit modification provisions.

B. Notification Requirements for Changes Reviewed under Protocol

1. The facility shall notify the Department in writing at least 30 calendar days in advance of making any changes reviewed under the protocol which meet the criteria above. When the change is to a source subject to a federally applicable requirement, the EPA administrator shall be



notified in a similar manner.

2. Notifications made in accordance with this protocol will include the following documentation:

a. Identification of the Title V permit emission unit, process(es), emission sources, and emission points affected by the proposed change with applicable revisions shown in a revised Emission Unit Matrix;

b. Description of the proposed change;

c. If appropriate, the identification and description of emissions control technology and compliance terms;

d. Documentation of the project's or emission source's compliance with respect to all state and/or federally applicable requirements according to an established procedure which includes the following steps:

i. For new emission sources, identify all contaminants and calculate the emission rate potential and maximum projected actual annual emission rates after the proposed change. For changes to existing emission sources, emission rate potential and maximum projected actual annual emission rates shall be provided for all contaminants affected by the change.

ii. Indicate the environmental rating for each contaminant identified in III.B.2.d.i as previously established by the Department or proposed based on the current DAR-1 Ambient Guideline Concentration Table or toxicological review.

iii. Provide the rationale for determining that major NSR does not apply which may include: 1) an explanation that the change is not a source project or modification under 40 CFR 52.21, 2) calculations that demonstrate that the emissions increase from the project alone is not significant or, 3) calculations that demonstrate that the net emissions increase for the contemporaneous period is not significant.

iv. Provide the necessary information for a facility-wide ambient impact analysis, including the maximum projected actual annual emission rates consistent with the permit.

v. Identify and evaluate the applicability of all regulations likely to be triggered by the new or changed emission source, using the emissions information,



environmental ratings, modeling results and knowledge of operations.

e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.

C. Review and Approval of Changes

1. The facility will be permitted to proceed with the change 30 days from the Department's receipt of the notification and/or additional information upon prior Departmental approval, whichever is first, unless the Department determines that a more detailed review (in accordance with #3 below) or a permit modification (in accordance with #2 below) is required.
2. The Department may require a permit modification, in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to notification do not meet the criteria under III.A or that the change may have a significant air quality impact or be otherwise potentially significant under SEQRA (6NYCRR Part 617).
3. The Department may require that the permittee not undertake the proposed change until the Department completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.
4. The Department shall respond to the permittee in writing with a determination under #2 or 3 above within 15 days of receipt of the notification and/or additional information from the permittee.

D. Additional Compliance Obligations for Changes Made Under this Protocol

1. Upon commencement of the change, the facility shall comply with all applicable requirements and permit conditions, including any amended or proposed conditions in accordance with III.A.1.a above.
2. On a semi-annual basis, the facility shall provide a summary of the changes made in accordance with this protocol during the corresponding period and a statement of the compliance status of each.



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 24: Non Applicable requirements
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (g)

Item 24.1:

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.

40 CFR Part 61, Subpart E

Emission Unit: U00063 Process: H29

Reason: The Silver Recovery Roaster (ES 101AJ) is not subject to 40 CFR 61 Subpart E because the silver rich "mud" is processed for the purpose of silver recovery, rather than wastewater treatment. Sludge incinerators or dryers which process sludge from operations other than industrial or municipal wastewater treatment plants are not subject to this rule.

Condition 25: Submittal of Episode Action Plans
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR Part 207

Item 25.1:

An episode action plan must be submitted for approval by the Department in accordance with the requirements of 6NYCRR Part 207. The plan shall contain detailed steps which will be taken by the facility to reduce air contaminant emissions during each stage of an air pollution episode.

Once approved, the facility shall take whatever actions are prescribed by the episode action plan when an air pollution episode is in effect.

Condition 26: Air pollution prohibited
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 211.1

Item 26.1:

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 27: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 231-11.2 (b)

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a modification where the projected actual annual emissions (rather than the potential to emit) is used to determine the project emission potential, and (1) the project emission potential is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of Subpart 231-13 of Part 231, or (2) the project emission potential when added to emissions excluded in accordance with 231-4.1(b)(40)(i)(c) is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of Subpart 231-13, the facility owner or operator, in addition to complying with any requirements under 6 NYCRR Part 201, must maintain the following information for a minimum of five years:

- (1) A description of the modification.
- (2) An identification of each new or modified emission source(s) including the associated processes and emission unit.
- (3) The calculation of the project emission potential for each modified emission source(s) including supporting documentation.
- (4) The date the modification commenced operation.

These recordkeeping requirements apply to exempt and trivial activities but do not affect their exempt or trivial permitting status under 6 NYCRR Part 201-3. The facility must submit these records to the Department, upon the Department's request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 28: National Emission Standard for Asbestos
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:40CFR 61, NESHAP Subpart M

Item 28.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 61, Subpart M.

Condition 29: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:40 CFR 64.7

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) Commencement of operation. Rochester Silver Works shall conduct the monitoring required under this part upon issuance of the Title V Permit.

(b) Proper maintenance. At all times, the facility shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), Kodak shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. Kodak shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.



(d) Response to excursions or exceedances.

(1) Upon detecting an excursion or exceedance, the facility shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether Rochester Silver Works has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(e) Documentation of need for improved monitoring. If the facility identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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



Condition 30: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:40 CFR 64.8

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Based on the results of a determination made under §64.7(d)(2), the Administrator or the permitting authority may require Rochester Silver Works to develop and implement a Quality improvement plan (QIP) in accordance with the requirements of §64.8.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 31: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:40 CFR 64.9

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Rochster Silver Works shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii). A report for monitoring shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;



(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(iii) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

Rochester Silver Works shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

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

**Condition 32: Emission Point Definition By Emission Unit
Effective between the dates of 11/15/2012 and 11/14/2017**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 32.1:

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

Emission Unit: U-00019



Emission Point: 14302
Height (ft.): 85 Diameter (in.): 3
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 143

Emission Point: 14303
Height (ft.): 72 Diameter (in.): 9
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 143

Item 32.2:

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

Emission Unit: U-00063

Emission Point: 10105
Height (ft.): 97 Diameter (in.): 30
NYTMN (km.): 4786.321 NYTME (km.): 293.129 Building: 101

Emission Point: 10109
Height (ft.): 77 Diameter (in.): 28
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 101

Emission Point: 101A1
Height (ft.): 9 Length (in.): 12 Width (in.): 26
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 101

Emission Point: 101A2
Height (ft.): 96 Diameter (in.): 30
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 101

Emission Point: 101A3
Height (ft.): 59 Diameter (in.): 24
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 101

Emission Point: 11002
Height (ft.): 55 Diameter (in.): 16
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 110

Emission Point: 110A1
Height (ft.): 50 Diameter (in.): 24
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 110

Item 32.3:

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

Emission Unit: U-00078

Emission Point: 11004
Height (ft.): 10 Diameter (in.): 24
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 110

Emission Point: 110B3



Height (ft.): 31	Diameter (in.): 10	
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110B7		
Height (ft.): 29	Diameter (in.): 48	
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110C0		
Height (ft.): 20	Diameter (in.): 3	
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110C5		
Height (ft.): 37	Diameter (in.): 6	
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110C6		
Height (ft.): 36	Diameter (in.): 22	
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110C7		
Height (ft.): 24	Diameter (in.): 2	
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110C8		
Height (ft.): 22	Diameter (in.): 2	
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110C9		
Height (ft.): 23	Diameter (in.): 10	
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110D0		
Height (ft.): 42	Length (in.): 30	Width (in.): 30
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110D1		
Height (ft.): 42	Length (in.): 30	Width (in.): 30
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110D2		
Height (ft.): 42	Length (in.): 30	Width (in.): 30
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 110D3		
Height (ft.): 42	Length (in.): 30	Width (in.): 30
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 110
Emission Point: 15602		
Height (ft.): 28	Diameter (in.): 8	
NYTMN (km.): 4786.321	NYTME (km.): 283.129	Building: 156

Condition 33: Process Definition By Emission Unit



Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 33.1:

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

Emission Unit: F-AC001
Process: 226 Source Classification Code: 4-01-003-36
Process Description:
SOLVENT METAL CLEANING MACHINES WITH 6
NYCRR PART 226 APPLICABILITY WHICH WOULD
OTHERWISE BE EXEMPT OR TRIVIAL CONSISTENT
WITH PART 201-3.

Emission Source/Control: F0226 - Process

Item 33.2:

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

Emission Unit: U-00019
Process: H39 Source Classification Code: 3-16-120-01
Process Description:
SILVER NITRATE MANUFACTURING AND
PURIFICATION OPERATIONS

Emission Source/Control: 14303 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 14305 - Control
Control Type: VENTURI SCRUBBER

Emission Source/Control: 143AA - Process

Emission Source/Control: 143AB - Process

Item 33.3:

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

Emission Unit: U-00063
Process: H29 Source Classification Code: 3-16-150-01
Process Description:
SILVER RECOVERY ROASTING AND SMELTING
PROCESS SUBJECT TO NOX RACT

Emission Source/Control: 10102 - Control
Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: 10103 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 10104 - Control

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Control Type: FABRIC FILTER

Emission Source/Control: 10115 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 101AI - Process

Emission Source/Control: 101AJ - Process

Item 33.4:

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

Emission Unit: U-00063
Process: H31 Source Classification Code: 3-16-150-01
Process Description: SLAG MOLD POURING/COOLING, AND SILVER CASTING

Emission Source/Control: 10111 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 10112 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 101AB - Process

Emission Source/Control: 101AD - Process

Item 33.5:

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

Emission Unit: U-00063
Process: H32 Source Classification Code: 3-16-140-02
Process Description: SILVER CONTAINING ASH CONVEYANCE SYSTEM

Emission Source/Control: 10114 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 101AF - Process

Item 33.6:

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

Emission Unit: U-00063
Process: H33 Source Classification Code: 3-16-160-02
Process Description:
ELECTROLYTIC CELLS AND ASSOCIATED PROCESS
TANKS USED IN THE RECOVERY OF SILVER WITH
NOX EMISSIONS > 15 LBS/DAY

Emission Source/Control: 11003 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 110AC - Process



FILM WASH OPERATIONS FOR THE REMOVAL OF
COATINGS & EMULSIONS FROM FILM SCRAP
PRODUCTS

Emission Source/Control: 110AQ - Process

Item 33.11:

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

Emission Unit: U-00078
Process: H41 Source Classification Code: 3-16-150-04
Process Description:
EXHAUST HOOD ASSOCIATED WITH SILVER
RECOVERY SAMPLING & DISPOSITION FROM
PHOTOGRAPHIC OPERATIONS WITH VOC EMISSION
RATE POTENTIAL (ERP) < 3 LBS/HR

Emission Source/Control: 110AJ - Process

Item 33.12:

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

Emission Unit: U-00078
Process: H43 Source Classification Code: 3-16-050-04
Process Description: FILM DRYING OPERATIONS EQUIPPED WITH DUST
CONTROL

Emission Source/Control: 11006 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 11007 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 11008 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 11009 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 110AU - Process

Emission Source/Control: 110AV - Process

Emission Source/Control: 110AW - Process

Emission Source/Control: 110AX - Process

Condition 34: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR Part 226



degreaser;

(c) no solvent is in the degreaser; or

(d) when manually cleaning metal parts in the cold cleaning degreaser.

(5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.

(6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.

(7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.

(a) the name and address of the solvent supplier;

(b) the type of solvent including the product or vendor identification number; and

(c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

D. Record Keeping Requirements:

Deviations from these requirements shall be recorded in a log maintained for this purpose within the corresponding operating area and shall be appropriately identified in the semi-annual monitoring report. In addition, the log must note whether the cold cleaner is equipped with an internal drain as specified in item A(2) above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 35: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (3)

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00019

Process: H39

Emission Source: 143AA

Regulated Contaminant(s):

CAS No: 0NY210-00-0

OXIDES OF NITROGEN

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Item 35.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to ensure compliance with Part 212 NO_x RACT and 40 CFR 64 CAM (Compliance Assurance Monitoring) requirements, this source shall not operate without the use of the aqueous NO_x scrubber (Control Device 14303), which shall be operated with a water flow rate at or above 60 liters per minute. This setpoint shall be alarmed and when water flow rate falls below 60 liters/minute feed to the process shall be stopped immediately. Records of the specified alarms shall be kept on site and made available to the Department upon request.

Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures.

Manufacturer Name/Model Number: Croll Reynold's 20T-14NO_x

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 60 liters per minute

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 36: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (3)

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00019

Process: H39

Emission Source: 143AA

Regulated Contaminant(s):

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

Item 36.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:



In order to ensure compliance with Part 212 NO_x RACT and 40 CFR 64 CAM (Compliance Assurance Monitoring) requirements, this source shall not operate without the use of the aqueous NO_x scrubber (Control Device 14303), which shall be operated at a pressure drop equal to or less than 7.5 kPA. This setpoint shall be alarmed and when the pressure drop exceeds 7.5 kPA feed to the process shall be stopped immediately. Records of the specified alarms shall be kept on site and made available to the Department upon request.

Monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures.

Manufacturer Name/Model Number: Croll Reynold's 20T-14NO_x

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 7.5 1000 newtons/square meter
(kilopascals)

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 37: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00019

Emission Point: 14303

Process: H39

Emission Source: 143AB

Item 37.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

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.

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

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00019
Process: H39

Emission Point: 14303
Emission Source: 143AB



Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. 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.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 39: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 212.4 (c)

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Item 39.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00063	Emission Point: 10109
Process: H31	Emission Source: 101AD

Emission Unit: U-00063	Emission Point: 101A1
Process: H32	Emission Source: 101AF

Emission Unit: U-00063	Emission Point: 11002
Process: H33	Emission Source: 110AC

Emission Unit: U-00063	Emission Point: 110A1
Process: H34	Emission Source: 110AE

Item 39.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



emissions problem has been corrected.

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

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 40: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 40.1:

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

Emission Unit: U-00063 Process: H29	Emission Point: 101A2 Emission Source: 101AJ
Emission Unit: U-00063 Process: H31	Emission Point: 10109 Emission Source: 101AD
Emission Unit: U-00063 Process: H32	Emission Point: 101A1 Emission Source: 101AF
Emission Unit: U-00063 Process: H33	Emission Point: 11002 Emission Source: 110AC
Emission Unit: U-00063 Process: H34	Emission Point: 110A1 Emission Source: 110AE

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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. The



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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. 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.

Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 41.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00063	Emission Point: 10105
Process: H31	Emission Source: 101AB

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Item 41.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to maintain compliance with the 0.050 gr/dscf particulate limit, the venturi scrubber (Control Device 10112) shall be cleaned and maintained quarterly to ensure proper performance. When pouring slag, the pressure drop across the venturi shall be monitored and maintained at or above 9 inches of water. If the pressure drop falls below this level, the equipment shall be evaluated and maintenance performed as necessary. Venturi maintenance records shall be maintained on site and made available to the Department upon request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 9 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 42: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00063

Emission Point: 10105

Process: H31

Emission Source: 101AB

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 42.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to maintain compliance with the 0.050 gr/dscf particulate limit as demonstrated during 1998 stack tests, opacity from EP 10105 shall be limited to 20%. During the slag pouring process, the opacity shall be continuously

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



monitored. If, during the slag pour, the 6 minute opacity average reaches 15%, the operator shall stop pouring. Pouring shall resume only after the 6 minute average opacity falls below 10%. At no point shall the 6 minute average opacity exceed 20%. For quality assurance of the opacity monitor, the facility shall follow the procedures of the approved monitoring plan and the opacity monitor shall be calibrated every 3 months. Records of the opacity monitoring and opacity monitor calibration shall be maintained on site and made available to the Department upon request.

Manufacturer Name/Model Number: Durag Model D-R 290

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: CONTINUOUS

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 43: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00063

Emission Point: 10105

Process: H31

Emission Source: 101AB

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 43.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 20% opacity limit, opacity shall be monitored continuously and recorded on a 6 minute average basis. For quality assurance of the opacity monitor, the facility shall follow the procedures of the approved monitoring plan. Records shall be kept on site and made available to the Department upon request. Violations of the opacity limit shall be reported to the Department according to the procedures of 201-1.4.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Manufacturer Name/Model Number: Durag Model D-R 290
Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: CONTINUOUS
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 44: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00063	Emission Point: 101A2
Process: H29	Emission Source: 101AJ

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

Item 44.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to maintain compliance with the 0.050 grains/dscf particulate standard and 40 CFR 52.21 PSD (Prevention of Significant Deterioration) requirements when the roaster (ES 101AJ) is operating, the baghouse (ES 10103) and scrubber (ES 10115) shall be operated and maintained according to manufacturer's recommendations. Bags will be inspected approximately 4 times per year when the roaster is shut down, and replaced as necessary. In addition, to provide an indicator of baghouse performance, the permittee shall operate an in-line opacity meter. The opacity meter shall be inspected as necessary for normal performance and manufacturer's recommended maintenance performed.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, opacity readings etc. The permittee will confirm that



during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

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, high in-line opacity readings etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. In addition, records of equipment inspections, maintenance, calibration and other quality assurance procedures, shall be maintained on site and made available to the Department upon request.

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.

The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: SEMI-ANNUALLY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 45: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (3)

Item 45.1:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



The Compliance Certification activity will be performed for:

Emission Unit: U-00063

Emission Point: 101A2

Process: H29

Emission Source: 101AJ

Regulated Contaminant(s):

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

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to comply with 6 NYCRR Part 212 Reasonably Available Control Technology (RACT) and 40 CFR 52.21 Prevention of Significant Deterioration (PSD) requirements for emissions of Nitrogen Oxides (NO_x), the total NO_x emissions from the #2 Roaster (ES 101AJ) shall not exceed 10.5 tons per year on a rolling twelve month basis.

The NO_x emissions shall be calculated using operating records of the hours of operation and the NO_x emission rate, 2.4 lb/hr, established during testing conducted in 2005 and 2006.

In addition, the #2 Roaster afterburner shall be equipped with low NO_x burners.

Records shall be kept on site for five years and made available to the Department upon request. This RACT determination is based on the most recent evaluation, dated August 2012, and shall be re-evaluated and submitted no later than September 1, 2017.

Monitoring Frequency: MONTHLY

Averaging Method: 12-month total, rolled monthly

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 46: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (i)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00063

Emission Point: 101A2

Process: H29

Emission Source: 101AJ

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



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

Item 46.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to ensure compliance with the 6 NYCRR Part 212 Reasonably Available Control Technology (RACT) requirement for overall removal efficiency of at least 81% for Volatile Organic Compounds (VOC) and 40 CFR 52.21 Prevention of Significant Deterioration (PSD), the afterburner (Control Device 10102) shall be operated at a minimum temperature of 1650 degrees F. The afterburner outlet gas temperature shall be monitored continuously and an hourly average temperature maintained above 1650 degrees F. This limit only applies when the roaster is processing sludge and is not starting up or shutting down. The afterburner temperature shall be alarmed to the control room. If an alarm is received, an inspection will be made to determine the cause of the alarm. If the temperature is determined to be too low, the source will be shutdown and necessary repairs shall be made before resuming operation. Records of hourly afterburner temperature, alarms, follow-up investigations and repairs shall be kept for a period of 5 years and made available to the Department upon request.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1650 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 47: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 40CFR 52.21, Subpart A

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00063 Emission Point: 101A2
Process: H29 Emission Source: 101AJ

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



CAS No: 007446-09-5 SULFUR DIOXIDE
CAS No: 007664-93-9 SULFURIC ACID

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to satisfy the requirements of 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and to comply with 40 CFR 64 Compliance Assurance Monitoring (CAM), the facility shall visually inspect the scrubber demister pad on an annual basis to ensure proper operation. This condition is based on the results of emission tests conducted in July 2005 and November 2006. Inspection records shall be maintained on site for a period of 5 years and made available to the Department upon request. Records shall contain the date(s) of all inspections, inspection findings and a listing of all pad repairs and replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 48: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:40CFR 52.21, Subpart A

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00063 Emission Point: 101A2
Process: H29 Emission Source: 101AJ

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE
CAS No: 007664-93-9 SULFURIC ACID

Item 48.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to satisfy the requirements of 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and to comply with 40 CFR 64 Compliance Assurance Monitoring (CAM), the facility shall maintain the hourly average

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



scrubber venturi pressure drop at or above 3.5 inches of water. This condition is based on the results of emission tests conducted in July 2005 and November 2006. The venturi pressure drop shall be alarmed to the control room. If an alarm is received, an inspection will be made to determine the cause of the alarm. If the pressure drop is determined to be too low, the source will be shutdown and necessary repairs shall be made before resuming operation. Records of hourly pressure drop, alarms, follow-up investigations and repairs shall be maintained on site for a period of 5 years and made available to the Department upon request.

Monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and local operating procedures.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 3.5 inches of water
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 49: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:40CFR 52.21, Subpart A

Item 49.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00063 Emission Point: 101A2
Process: H29 Emission Source: 101AJ

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE
CAS No: 007664-93-9 SULFURIC ACID

Item 49.2:
Compliance Certification shall include the following monitoring:

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

Monitoring Description:
In order to satisfy the requirements of 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and to comply with 40 CFR 64 Compliance Assurance Monitoring (CAM), the facility shall maintain the hourly average scrubber tray recirculation pH at or above 6. This



condition is based on the results of emission tests conducted in July 2005 and November 2006. The tray recirculation pH shall be alarmed to the control room. If an alarm is received, an inspection will be made to determine the cause of the alarm. If the pH is determined to be too low, the source will be shutdown and necessary repairs shall be made before resuming operation. Records of hourly scrubber tray recirculation pH, alarms, follow-up investigations and repairs shall be maintained on site for a period of 5 years and made available to the Department upon request.

Monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and local operating procedures.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 6 pH (STANDARD) units

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 50: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:40CFR 52.21, Subpart A

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00063

Emission Point: 101A2

Process: H29

Emission Source: 101AJ

Regulated Contaminant(s):

CAS No: 007446-09-5

SULFUR DIOXIDE

CAS No: 007664-93-9

SULFURIC ACID

Item 50.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to satisfy the requirements of 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and to comply with 40 CFR 64 Compliance Assurance Monitoring (CAM), the facility shall maintain the hourly average scrubber quench temperature at or below 175 degrees F. This condition is based on the results of emission tests



conducted in July 2005 and November 2006. The quench temperature shall be alarmed to the control room. If an alarm is received, an inspection will be made to determine the cause of the alarm. If the temperature is determined to be too high, the source will be shutdown and necessary repairs shall be made before resuming operation. Records of hourly scrubber quench temperature, alarms, follow-up investigations and repairs shall be maintained on site for a period of 5 years and made available to the Department upon request.

Monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and local operating procedures.

Parameter Monitored: TEMPERATURE
Upper Permit Limit: 175 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 51.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00063 Emission Point: 101A3
Process: H29

Item 51.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)
Monitoring Description:

The average opacity during any consecutive six minutes shall be maintained below 20%. Compliance with this limit shall be demonstrated with a continuous opacity monitor located in the ductwork of the EP 101A3 stack after the smelter (ES 101AI). For quality assurance of the opacity monitor, the facility shall follow the manufacturer's recommended operation, calibration and maintenance procedures. Records of six minute average opacity readings, calibrations and other quality assurance procedures and baghouse maintenance shall be maintained on site and made available to the Department upon request.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Manufacturer Name/Model Number: Durag Model D-R 290
Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: CONTINUOUS
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00063	Emission Point: 101A3
Process: H29	Emission Source: 101AI

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

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)
Monitoring Description:

In order to maintain compliance with the 0.050 grains/dscf particulate standard when the #4 smelter (ES 101AI) is operating, the baghouse (Control Device 10104) shall be operated and maintained according to manufacturer's specifications. To provide an indicator of baghouse performance, opacity shall be monitored continuously and maintained below 20%. A six minute average opacity reading of 10% or greater shall result in the operator stopping the feed to the smelter in a controlled manner. Prior to resuming operation of the smelter, the opacity meter and baghouses shall be inspected as necessary, and appropriate maintenance performed. In addition, bags shall be inspected every six months and replaced as necessary.

For quality assurance of the opacity monitor, the facility shall follow the manufacturer's recommended operation, calibration and maintenance procedures. Records of six minute average opacity readings, calibrations and other quality assurance procedures, and baghouse maintenance shall be maintained on site and made available to the Department upon request.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Manufacturer Name/Model Number: Durag Model D-R 290
Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: CONTINUOUS
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 53: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (3)

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00063 Emission Point: 11002
Process: H33 Emission Source: 110AC

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

Item 53.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to comply with 6 NYCRR Part 212 Reasonably Available Control Technology (RACT) requirements for emissions of Nitrogen Oxides (NOx), the demister associated with Emission Source 110AC (Control Device 11003), shall be operated at a flow rate at or above 3 gallons per minute. The flow rate shall be verified on a weekly basis. Maintenance records shall be kept on site and made available to the Department upon request.

Parameter Monitored: FLOW RATE
Lower Permit Limit: 3 gallons per minute
Monitoring Frequency: WEEKLY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 54: Compliance Certification



Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 54.1:

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

Emission Unit: U-00078	Emission Point: 15602
Process: H30	Emission Source: 156AA
Emission Unit: U-00078	Emission Point: 110C7
Process: H37	Emission Source: 110AR

Item 54.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

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.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



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

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 55: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 55.1:

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

Emission Unit: U-00078 Process: H30	Emission Point: 15602 Emission Source: 156AA
Emission Unit: U-00078 Process: H37	Emission Point: 110C7 Emission Source: 110AR
Emission Unit: U-00078 Process: H43	Emission Point: 110D0 Emission Source: 110AU
Emission Unit: U-00078 Process: H43	Emission Point: 110D1 Emission Source: 110AV
Emission Unit: U-00078 Process: H43	Emission Point: 110D2 Emission Source: 110AW
Emission Unit: U-00078 Process: H43	Emission Point: 110D3 Emission Source: 110AX

Item 55.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. 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.

Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 56: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (iii)

Item 56.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00078 Emission Point: 110C6
Process: H38 Emission Source: 110AQ

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Item 56.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Cowles Washers (ES 110AQ) are subject to 6 NYCRR Part 212.10 Reasonably Available Control Technology (RACT) requirements for emissions of Volatile Organic Compounds (VOC). The RACT determination is to be re-evaluated every five years. Based on the most recent re-evaluation, dated August 2012, annual emissions of VOC from EP 110C6, which vents the Cowles Washers (ES 110AQ), shall not exceed 30.02 tpy on a rolling 12-month basis. VOC emissions shall be calculated monthly and incorporated into a 12-month rolling total. VOC emissions calculations shall be based on the quantities of unwashed film processed by type, amount of residual VOC in each type, and a total of VOC emissions calculated by multiplying the above two parameters. Records shall be kept on site for five years and made available to the Department upon request.

The next re-evaluation of this RACT determination shall be submitted by August 31, 2017.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 57: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00078

Emission Point: 110D0

Process: H43

Emission Source: 110AU

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 57.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



grains/dscf particulate standard, the panel filter (Emission Control Device 11009) will be inspected weekly and replaced if necessary. Records of filter changes shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 58: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00078

Emission Point: 110D1

Process: H43

Emission Source: 110AV

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 58.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, the panel filter (Emission Control Device 11006) will be inspected weekly and replaced if necessary. Records of filter changes shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 59: Compliance Certification
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 59.1:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



The Compliance Certification activity will be performed for:

Emission Unit: U-00078

Emission Point: 110D2

Process: H43

Emission Source: 110AW

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 59.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, the panel filter (Emission Control Device 11007) will be inspected weekly and replaced if necessary. Records of filter changes shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 60: Compliance Certification

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00078

Emission Point: 110D3

Process: H43

Emission Source: 110AX

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 60.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard, the panel filter (Emission Control Device 11008) will be inspected weekly and replaced if necessary. Records of filter changes shall be retained on site for five years and made available to the Department upon request.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

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

Condition 61: Contaminant List
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement:ECL 19-0301

Item 61.1:

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

CAS No: 000067-64-1
Name: DIMETHYL KETONE



CAS No: 000071-36-3

Name: BUTANOL

CAS No: 000075-07-0

Name: ACETALDEHYDE

CAS No: 000075-09-2

Name: DICHLOROMETHANE

CAS No: 000110-82-7

Name: CYCLOHEXANE

CAS No: 007440-02-0

Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 007440-38-2

Name: ARSENIC

CAS No: 007440-43-9

Name: CADMIUM

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 007647-01-0

Name: HYDROGEN CHLORIDE

CAS No: 007664-93-9

Name: SULFURIC ACID

CAS No: 010035-10-6

Name: HYDROGEN BROMIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

Name: VOC

Condition 62: Unavoidable noncompliance and violations
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement:6 NYCRR 201-1.4

Item 62.1:

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



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

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

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

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

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

Condition 63: Visible Emissions Limited
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement:6 NYCRR 211.2

Item 63.1:

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 64: Emissions from new emission sources and/or modifications
Effective between the dates of 11/15/2012 and 11/14/2017**

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 64.1:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

**Condition 65: Less restrictive permissible emission rate possible if
BACT applied
Effective between the dates of 11/15/2012 and 11/14/2017**

Applicable State Requirement:6 NYCRR 212.5 (d)

Item 65.1:

Where a source owner can demonstrate to the satisfaction of the commissioner that he will apply best available control technology, the commissioner may specify a less restrictive permissible emission rate, emission standard or degree of air cleaning for such source than required under this Part provided that the less restrictive requirement is equivalent to that which can be achieved through the application of best available control technology

**Condition 66: Compliance Demonstration
Effective between the dates of 11/15/2012 and 11/14/2017**

Applicable State Requirement:6 NYCRR 231-11.2 (e)

Item 66.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 66.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

For a modification where the projected actual emissions (rather than the potential to emit) is used to determine the project emission potential, and (1) the project emission potential is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of 6 NYCRR Part 231-13, but equals or exceeds 50 percent of the applicable significant project threshold when emissions excluded in accordance with 231-4.1(b)(40)(i)(c) are added, or (2) the project emission potential equals or exceeds 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of 6 NYCRR Part 231-13, the facility owner or operator must submit an application to modify the facility



permit under the minor permit provisions of 6 NYCRR Part 201-6 or obtain a preconstruction permit under the provisions of Subpart 201-6, and must:

(1) maintain the following information for a minimum of five years:

(i) a description of the modification.

(ii) an identification of each new or modified emission source(s) including the associated processes and emission unit.

(iii) the calculation of the project emission potential for each modified emission source(s) including supporting documentation.

(iv) the date the modification commenced operation.

(2) monitor the emissions of each regulated NSR contaminant from the emission source(s) that will increase as a result of the modification, and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the modification, or for a period of 10 years following resumption of regular operations after the change if the modification increases the design capacity of or potential to emit the regulated NSR contaminant at such emission source(s).

(3) submit a report to the department within 30 days after the end of each year during which records must be generated in accordance with 6 NYCRR 231-11.2(c)(2). The report must contain:

(i) the name, address, and telephone number of the major facility.

(ii) the annual emissions as calculated pursuant to 6 NYCRR 231-11.2(c)(2).

(iii) a comparison of actual annual emissions to the projected actual emissions and, if applicable, an explanation as to why the actual annual emissions exceeded the projected actual emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****



Condition 67: Compliance Demonstration
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 67.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00063 Emission Point: 101A1
Process: H34 Emission Source: 110AE

Regulated Contaminant(s):
CAS No: 007440-02-0 NICKEL METAL AND INSOLUBLE
COMPOUNDS
CAS No: 007440-43-9 CADMIUM
CAS No: 007440-38-2 ARSENIC

Item 67.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to maintain 99% control of arsenic, cadmium and nickel emissions from EP 110A1, the 2-stage dry filter (Control Device 11005) must be operated and maintained according to the manufacturer's specifications. The pressure drop across the filters shall be recorded once a month and maintained below 5" water. The filters shall be changed as necessary to ensure proper operating pressure differential. Records of pressure differential and filter changes shall be kept on site and made available to the Department upon request.

Parameter Monitored: PRESSURE CHANGE
Upper Permit Limit: 5 inches of water
Monitoring Frequency: MONTHLY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 68: Compliance Demonstration
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 68.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00063 Emission Point: 101A2
Process: H29 Emission Source: 101AJ



Regulated Contaminant(s):
CAS No: 007647-01-0 HYDROGEN CHLORIDE
CAS No: 010035-10-6 HYDROGEN BROMIDE
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 68.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to satisfy the requirements of 6 NYCRR Part 212.4(a), the facility shall visually inspect the scrubber demister pad on an annual basis to ensure proper operation. Inspection records shall be maintained on site for a period of 5 years and made available to the Department upon request. Records shall contain the date(s) of all inspections, inspection findings and a listing of all pad repairs and replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 69: Compliance Demonstration

Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement: 6 NYCRR 212.4 (a)

Item 69.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00063 Emission Point: 101A2
Process: H29 Emission Source: 101AJ

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE
CAS No: 010035-10-6 HYDROGEN BROMIDE
CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 69.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to satisfy the requirements of 6 NYCRR Part 212.4(a), the facility shall maintain the hourly average scrubber tray recirculation pH at or above 6. The tray recirculation pH shall be alarmed to the control room. If an alarm is received, an inspection will be made to determine the cause of the alarm. If the pH is determined to be too low, the source will be shutdown and necessary

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



repairs shall be made before resuming operation. Records of hourly scrubber tray recirculation pH, alarms, follow-up investigations and repairs shall be maintained on site for a period of 5 years and made available to the Department upon request.

Monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and local operating procedures.

Parameter Monitored: ACIDITY/ALKALINITY
Lower Permit Limit: 6 pH (STANDARD) units
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 70: Compliance Demonstration
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement: 6 NYCRR 212.4 (a)

Item 70.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00063	Emission Point: 101A2
Process: H29	Emission Source: 101AJ

Regulated Contaminant(s):	
CAS No: 007647-01-0	HYDROGEN CHLORIDE
CAS No: 010035-10-6	HYDROGEN BROMIDE
CAS No: 007446-09-5	SULFUR DIOXIDE

Item 70.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to satisfy the requirements of 6 NYCRR Part 212.4(a), the facility shall maintain the hourly average scrubber quench temperature at or below 175 degrees F. The quench temperature shall be alarmed to the control room. If an alarm is received, an inspection will be made to determine the cause of the alarm. If the temperature is determined to be too high, the source will be shutdown and necessary repairs shall be made before resuming operation. Records of hourly scrubber quench temperature, alarms, follow-up investigations and repairs shall be maintained on site for a period of 5 years and made available to the Department upon request.

Monitoring devices shall be calibrated and maintained

New York State Department of Environmental Conservation

Permit ID: 8-2614-00888/00001

Facility DEC ID: 8261400888



according to the manufacturer's recommendations and local operating procedures.

Parameter Monitored: TEMPERATURE
Upper Permit Limit: 175 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 71: Compliance Demonstration
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 71.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00063 Emission Point: 101A2
Process: H29 Emission Source: 101AJ

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE
CAS No: 010035-10-6 HYDROGEN BROMIDE
CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 71.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to satisfy the requirements 6 NYCRR Part 212.4(a), the facility shall maintain the hourly average scrubber venturi pressure drop at or above 3.5 inches of water. The venturi pressure drop shall be alarmed to the control room. If an alarm is received, an inspection will be made to determine the cause of the alarm. If the pressure drop is determined to be too low, the source will be shutdown and necessary repairs shall be made before resuming operation. Records of hourly pressure drop, alarms, follow-up investigations and repairs shall be maintained on site for a period of 5 years and made available to the Department upon request.

Monitoring devices shall be calibrated and maintained according to the manufacturer's recommendations and local operating procedures.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 3.5 inches of water
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE



Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 72: Compliance Demonstration
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 72.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00063 Emission Point: 101A2
Process: H29 Emission Source: 101AJ

Item 72.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.4(a) control requirements for organic compounds, the afterburner (Control Device 10102) shall be operated at a minimum temperature of 1650 degrees F. The afterburner outlet gas temperature shall be monitored continuously and an hourly average temperature maintained above 1650 degrees F. This limit only applies when the roaster is processing sludge and is not starting up or shutting down. The afterburner temperature shall be alarmed to the control room. If an alarm is received, an inspection will be made to determine the cause of the alarm. If the temperature is determined to be too low, the source will be shutdown and necessary repairs shall be made before resuming operation. Records of hourly afterburner temperature, alarms, follow-up investigations and repairs shall be kept for a period of 5 years and made available to the Department upon request.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1650 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 73: Compliance Demonstration
Effective between the dates of 11/15/2012 and 11/14/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 73.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00078 Emission Point: 110C6



Process: H38

Emission Source: 110AQ

Regulated Contaminant(s):

CAS No: 000071-36-3	BUTANOL
CAS No: 000075-07-0	ACETALDEHYDE
CAS No: 000075-09-2	DICHLOROMETHANE
CAS No: 000110-82-7	CYCLOHEXANE
CAS No: 000067-64-1	DIMETHYL KETONE

Item 73.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212 Table 2 or Best Available Control Technology (BACT) requirements, emission limits have been established in accordance with Part 212.5(d) for this source. Based on the BACT evaluation, dated August 2012, the total emissions of dichloromethane, acetone (dimethyl ketone), butanol and cyclohexane are limited to 37.04 tons per year on a rolling twelve-month basis. In addition, the total emissions of A-rated compounds (ex. dichloromethane) are limited to 3.14 tons per year on a rolling twelve-month basis. Emissions shall be calculated monthly and incorporated into a 12-month rolling total. Emissions calculations shall be based on the quantities of unwashed film processed by type, amount of residual contaminants in each type, and a total contaminant emissions calculated by multiplying the above two parameters. Records shall be kept on site for five years and made available to the Department upon request.

This BACT determination is to be re-evaluated every five years. The next re-evaluation shall be submitted by August 31, 2017.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

