

New York State Department of Environmental Conservation
Facility DEC ID: 8453200105



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-4532-00105/00001
Mod 0 Effective Date: 08/31/1998 Expiration Date: No expiration date.
Mod 1 Effective Date: 06/10/2004 Expiration Date: No expiration date.

Permit Issued To: SCEPTER INC
1485 SCEPTER LN
WAVERLY, TN 37185-3290

Facility: SCEPTER INC. - SENECA FALLS OPERATIONS
11 LAMB ROAD
SENECA FALLS, NY 13148

Contact: LYNN JACKSON
1465 SCEPTER LANE
WAVERLY, TN 37185
(931) 535-3565

Description:
First modification (Mod 1) of the Air State Facility permit issued August 31, 1998.

Facility operations include loading and melting of scrap aluminum and fluxing agents, casting of aluminum ingots, and handling and disposal of the waste "salt cake", which is fluxing agent combined with impurities.

Mod 1 authorizes the addition of two furnaces to the single Facility Emission Unit, 1-FURNS, expanding facility scrap aluminum processing operations. These two furnaces were originally authorized in the original State Facility Permit, but were not constructed with the two existing furnaces. After February 11, 1999, the addition of new furnaces became subject to the secondary aluminum national emission standard for hazardous air pollutants (NESHAP) requirements of 40 CFR 63 Subpart RRR.

Mod 1 maintains an existing 100 ton per year Title V cap on total particulate emissions, and adds Special Permit Conditions to restrict scrap processed to limit emissions as follows:

Limits emissions of hydrogen chloride (HCl) in the modified permit to less than 10 tons per year, to restrict facility hazardous air pollutant (HAP) emissions below the Part 201-6 (Title V) threshold of 10 tons per year of any individual HAP compound, and 25 tons per year of all HAP combined.

Limits emissions of ammonia (NH₃) from acid gas control devices to 145 tons per year in the modified



New York State Department of Environmental Conservation
Facility DEC ID: 8453200105

permit to keep concentrations below the Department's air guideline concentration (AGC) for any off site receptor.

Limits emissions of hydrogen fluoride (HF) in the modified permit to 0.265 pounds per hour (1.16 tons per year) to ensure compliance with HF standards in 6NYCRR Part 257-8.

In addition, Special Permit Conditions in the modified permit will expand facility monitoring to ensure compliance with Part 212.4c particulate, and Part 212.6a opacity standards.

Finally, 40 CFR 63 Subpart RRR NESHAP requirements in the modified permit include stack testing for dioxins and furans for the two new furnaces. Dioxin and furan stack testing showed emissions from the two existing furnaces in compliance with the NESHAP standard.

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: PETER A LENT
 DIVISION OF ENVIRONMENTAL PERMITS
 6274 EAST AVON LIMA RD
 AVON, NY 14414-9519

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 8
HEADQUARTERS



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

Condition 1-2: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1-2.1:

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

Item 1-2.2:

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

Item 1-2.3:

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

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 3-0301.2(g)

Expired by Mod No: 1

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 written or verbal notification is provided by the Department at least 24 hours prior to such inspection.

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. 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:



New York State Department of Environmental Conservation
Facility DEC ID: 8453200105

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

Condition 1-1: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:

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

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 1

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.

Condition 1-3: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 1-3.1:

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

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions,



New York State Department of Environmental Conservation
Facility DEC ID: 8453200105

relevant technology or applicable law or regulations since the issuance of the existing permit;
e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

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

Expired by Mod No: 1

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 8 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(716) 226-2466



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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1485 SCEPTER LN
WAVERLY, TN 37185-3290

Facility: SCEPTER INC. - SENECA FALLS OPERATIONS
11 LAMB ROAD
SENECA FALLS, NY 13148

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



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-1 6NYCRR 211.3: Compliance Demonstration
- 1-2 6NYCRR 212.6(a): Compliance Demonstration
- 1-3 40CFR 63.1506(b), Subpart RRR: Compliance Demonstration
- 1-4 40CFR 63.1506(p), Subpart RRR: Operating requirements - Corrective Action
- 1-5 40CFR 63.1510(b), Subpart RRR: Monitoring and Compliance Requirements - OM&M Plan
- 1-6 40CFR 63.1510(s), Subpart RRR: Site-specific requirements for secondary aluminum processing units
- 1-7 40CFR 63.1515, Subpart RRR: Secondary Aluminum Notifications
- 1-8 40CFR 63.1516, Subpart RRR: Compliance Demonstration
- 1-9 40CFR 63.1517, Subpart RRR: Secondary Aluminum MACT Recordkeeping

Emission Unit Level

EU=1-FURNS,Proc=001

- 1-10 6NYCRR 212.4(b): Compliance Demonstration
- 1-11 6NYCRR 212.4(c): Compliance Demonstration
- 1-12 6NYCRR 212.4(c): Compliance Demonstration
- 1-13 6NYCRR 257-8: Compliance Demonstration
- 1-14 6NYCRR 257-8: Compliance Demonstration
- 1-15 40CFR 63.1505(i), Subpart RRR: Group 1 Furnace Dioxin/Furan Limit
- 1-16 40CFR 63.1506(c), Subpart RRR: Compliance Demonstration
- 1-17 40CFR 63.1506(d), Subpart RRR: Compliance Demonstration
- 1-18 40CFR 63.1511(a), Subpart RRR: Site-specific test plan
- 1-19 40CFR 63.1511(b), Subpart RRR: Compliance Demonstration
- 1-20 40CFR 63.1511(g), Subpart RRR: Establishment of Monitoring and Operating Parameter Values
- 1-21 40CFR 63.1512(k), Subpart RRR: Performance Test/Compliance Demonstration Requirements and Procedures - Feed/Charge Weight Measurement.
- 1-22 40CFR 63.1517(b)(17), Subpart RRR: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 1-23 ECL 19-0301: Contaminant List
- 1-24 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 26 6NYCRR 201-5: Emission Unit Definition
- 1-25 6NYCRR 201-7.2: Facility Permissible Emissions
- *1-26 6NYCRR 201-7.2: Capping Monitoring Condition
- 16 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

29 6NYCRR 201-5: Emission Point Definition By Emission Unit

30 6NYCRR 201-5: Process Definition By Emission Unit

EU=1-FURNS,Proc=001

1-27 6NYCRR 212.4(a): Compliance Demonstration

1-28 6NYCRR 212.4(b): Compliance Demonstration

NOTE: * preceding the condition number indicates capping. Mod 0 Permit Effective Date:
08/31/1998 Permit Expiration Date: No expiration date.

Mod 1 Permit Effective Date: 06/10/2004

Permit Expiration Date: No expiration date.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



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

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6NYCRR Part 201-1.5

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

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

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

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

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

FEDERAL APPLICABLE REQUIREMENTS

The following conditions are federally enforceable.

Condition 1-1: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 1-1.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Except as permitted by a specific part of Title 6 of the NYCRR 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 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.



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Reference Test Method: Reference Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-2: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 1-2.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The maintenance procedure applicable to this permit for compliance with the opacity requirements under section 212.6(a) will include the following:

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which 6NYCRR Part 212.6(a) applies once per batch while the process is in operation during daylight hours. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this may be zero percent opacity for many or all emission sources), the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected. If the permittee expects the excess visible emissions to continue, the



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Department will be notified immediately.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

If the opacity is determined to exceed the limits of section 212.6(a), the facility will be determined to be in violation, the permittee will remedy the problem, and will contact the Department. The provisions of Part 201-1.4 shall apply.

The records of these observations will be recorded at the facility and shall be available for inspection by Department representatives upon request. Records will be maintained for a period of at least five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-3: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1506(b), Subpart RRR

Item 1-3.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:

- (1) The type of affected source or emission unit (e.g.,



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).

(2) The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.

The owner or operator must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels are intact and legible.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

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

Condition 1-4: Operating requirements - Corrective Action
Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1506(p), Subpart RRR

Item 1-4.1:

When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the owner or operator must initiate corrective action. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.

Condition 1-5: Monitoring and Compliance Requirements - OM&M Plan
Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1510(b), Subpart RRR

Item 1-5.1:

The owner or operator must prepare and implement for each new or existing affected source and emission unit, a written operation, maintenance, and monitoring (OM&M) plan. The owner or operator must submit the plan to NYSDEC for review and approval as part of the application for a part 70 or part 71



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

permit. Any subsequent changes to the plan must be submitted to the NYSDEC for review and approval. Pending approval by the NYSDEC of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:

- (1) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
- (2) A monitoring schedule for each affected source and emission unit.
- (3) Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR Part 63.1505.
- (4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
 - (i) Calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
 - (ii) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR Part 63 Subpart A.
- (5) Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
- (6) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (b)(1) of 40 CFR §63.1510, including:
 - (i) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
 - (ii) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- (7) A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (8) Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR §63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.

Condition 1-6: Site-specific requirements for secondary aluminum processing units
Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1510(s), Subpart RRR

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



Item 1-6.1:

(1) An owner or operator of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR Part 63.1510(b), the following information:

(i) The identification of each emission unit in the secondary aluminum processing unit;

(ii) The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;

(iii) The emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;

(iv) Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of this subpart; and

(v) The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in 40 CFR Part 63.1510(t).

(2) The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:

(i) Any averaging among emissions of differing pollutants;

(ii) The inclusion of any affected sources other than emission units in a secondary aluminum processing unit;

(iii) The inclusion of any emission unit while it is shutdown; or

(iv) The inclusion of any periods of startup, shutdown, or malfunction in emission calculations.

(3) To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the owner or operator must submit a request to the applicable permitting authority containing the information required by paragraph (1) of this condition and obtain approval of the applicable permitting authority prior to implementing any revisions.

Condition 1-7: Secondary Aluminum Notifications

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1515, Subpart RRR

Item 1-7.1:

(1) As required by 40 CFR §63.9(b)(1), the owner or operator must provide notification for an area source that subsequently increases its emissions such that the source is a major source subject to the standard.



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

(2) As required by §63.9(b)(5), an owner or operator who intends to construct a new affected source or reconstruct an affected source subject to this subpart, or reconstruct a source such that it becomes an affected source subject to this subpart, must provide notification of the intended construction or reconstruction. The notification must include all the information required for an application for approval of construction or reconstruction as required by §63.5(d). For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.

(3) As required by §63.9(e) and (f), the owner or operator must provide notification of the anticipated date for conducting performance tests and visible emission observations. The owner or operator must notify the Administrator of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.

(4) Each owner or operator must submit a notification of compliance status report within 60 days after the compliance dates specified in §63.1501. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in paragraphs (b)(1) through (b)(10) of 40CFR §63.1515. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. If an owner or operator submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted.

Condition 1-8: Compliance Demonstration
Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1516, Subpart RRR

Item 1-8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Startup, shutdown, and malfunction plan/reports: The owner or operator must develop and implement a written plan as described in 40 CFR §63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator shall also keep records of each event as

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



required by §63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as

described in §63.6(e)(3). In addition to the information required in §63.6(e)(3), the plan must include:

(1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

Excess emissions/summary report. As required by §63.10(e)(3), the owner or operator must submit

semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in §63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period. A report must be submitted if any of the conditions listed in 40 CFR §63.1516(b)(1) occur during a 6-month reporting period.

The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-9: Secondary Aluminum MACT Recordkeeping
Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1517, Subpart RRR

Item 1-9.1:

(a) As required by §63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions (40 CFR 63 Subpart A) and 40 CFR 63



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Subpart RRR.

(1) The owner or operator must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

(2) The owner or operator may retain records on microfilm, computer disks, magnetic tape, or microfiche; and

(3) The owner or operator may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

(b) In addition to the general records required by §63.10(b), the owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum processing unit) must maintain additional records listed in 40 CFR §63.1517(b)(1) through (b)(17) as applicable.

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

Condition 1-10: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(b)

Item 1-10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 007664-41-7 AMMONIA

Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

AMMONIA EMISSIONS ARE LIMITED TO LESS 145 TONS PER YEAR, ON A 12 MONTH ROLLING TOTAL. RECORDS OF METAL CHARGED WILL BE KEPT PER BATCH OR HEAT. AMMONIA EMISSIONS WILL BE CALCULATED MONTHLY USING THE EMISSION FACTOR DEVELOPED DURING THE MARCH 2003 STACK TEST (EXPRESSED IN POUNDS OF AMMONIA PER TON OF METAL CHARGED).

Work Practice Type: PARAMETER OF PROCESS MATERIAL



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Process Material: METAL
Parameter Monitored: AMMONIA
Upper Permit Limit: 145 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 12 calendar month(s).

Condition 1-11: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 1-11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS
Process: 001

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

Item 1-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

THE CONDITION OF ALL BAGHOUSES AND BAGS SHALL BE INSPECTED MONTHLY. A SIGNED LOG OF OBSERVATIONS WILL BE KEPT ON-SITE. DESCRIPTIONS ABOUT MAINTENANCE AND REPAIR ACTIVITIES WILL BE INCLUDED IN THE LOG IN A FROMAT ACCEPTABLE TO THE DEPARTMENT.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-12: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 1-12.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-12.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates are limited to less than 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 observations during operation at the monitoring frequency stated below. These observations include pertinent information relating to particulate emissions of the source including production rate, process material, baghouse pressure drop and visible emissions (VE during daylight hours only). The permittee will confirm that all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure this source to be in compliance with the particulate emission rate.

Additionally, the permittee will immediately investigate any instance where there is cause to believe that particulate emissions above 0.05 gr/dscf are occurring or have occurred from a process source. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. During these instances the permittee shall determine the cause, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress report and annual compliance certifications required of



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

all permittees subject to Title V must include a summary of these instances.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-13: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 257-8

Item 1-13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 1-13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

HF EMISSIONS ARE LIMITED TO 0.265 POUNDS PER HOUR. RECORDS OF METAL CHARGED WILL BE KEPT PER BATCH OR HEAT. EMISSIONS WILL BE CALCULATED DAILY USING THE EMISSION FACTOR DEVELOPED DURING THE MARCH 2003 STACK TEST (0.0104 POUNDS OF HYDROGEN FLUORIDE PER TON OF METAL CHARGED).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: METAL

Parameter Monitored: HYDROGEN FLUORIDE

Upper Permit Limit: 0.265 pounds per hour

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Averaging Method: 24 HOUR BLOCK AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-14: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 257-8

Item 1-14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 1-14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

THE PH OF THE EXHAUST STREAM FOR EACH FURNACE WILL BE CONTINUOUSLY MONITORED AND RECORDED ON A STRIP CHART RECORDER TO ENSURE PROPER OPERATION OF EACH AMMONIA INJECTION SYSTEM AND VERIFY EXPECTED HYDROGEN FLUORIDE EMISSION RATES.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-15: Group 1 Furnace Dioxin/Furan Limit

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1505(i), Subpart RRR

Item 1-15.1:

This Condition applies to Emission Unit: 1-FURNS

Process: 001

Item 1-15.2:

The owner or operator of a group 1 furnace must use the limit in this condition to determine the emission standards for a Secondary Aluminum Processing Unit pursuant to §63.1505(k). The limit for Dioxins/Furans is 15 µg of D/F TEQ per Mg (2.1 x 10⁻⁴ gr of D/F TEQ per ton) of feed/charge from a group 1 furnace at a secondary aluminum production facility that is a major or area source. This limit does not apply if the furnace processes only clean charge.

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



Condition 1-16: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1506(c), Subpart RRR

Item 1-16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 1-16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each affected source or emission unit equipped with an add-on air pollution control device, the owner or operator must:

(1) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Handbook of Recommended Practice" (incorporated by reference in 40CFR Subpart RRR §63.1502);

(2) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

(3) Operate each capture/collection system according to the procedures and requirements in the OM&M plan.

The owner or operator must:

(4) Install, operate, and maintain a capture/collection system for each affected source and emission unit equipped with an add-on air pollution control device; and

(5) Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the above operating requirements and record the results of each inspection.



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Monitoring Frequency: ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2004.
Subsequent reports are due every 6 calendar month(s).

Condition 1-17: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1506(d), Subpart RRR

Item 1-17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS
Process: 001

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

Item 1-17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or $\mu\text{g/Mg}$ (gr/ton) of feed/charge must:

- (1) Except as provided in paragraph (3) of this condition, install, calibrate, operate and maintain a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and
- (2) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
- (3) The owner or operator may chose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:
 - (i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and
 - (ii) All calculations to demonstrate compliance with the

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.

(4) Feed/charge or aluminum production within SAPUs must be measured and recorded for each group 1 furnace and/or in-line fluxer.

(5) The accuracy of the weight measurement device or procedure must be ± 1 percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.

(6) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

(7) As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.

All weight measurements will be recorded and averaged per batch or operating cycle.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

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

Condition 1-18: Site-specific test plan

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1511(a), Subpart RRR



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Item 1-18.1:

This Condition applies to Emission Unit: 1-FURNS
Process: 001

Item 1-18.2:

Prior to conducting a performance test required by 40 CFR Part 63 Subpart RRR, the owner or operator must prepare and submit a site-specific test plan meeting the requirements in 40 CFR Part 63.7(c).

Condition 1-19: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1511(b), Subpart RRR

Item 1-19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 1-19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Furnaces #1 and #2 have passed the D/F test. The following condition applies to proposed furnaces #3 and #4:

Following approval of the site-specific test plan, the owner or operator must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emission unit, and report the results in the notification of compliance status report as described in 40 CFR Part 63.1515(b). The owner or operator must conduct each performance test according to the requirements of the general provisions in subpart A of this part and this subpart. Owners or operators of affected sources located at facilities which are area sources are subject only to those performance testing requirements pertaining to D/F.

(1) The owner or operator must conduct each test while the affected source or emission unit is operating at the

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.

(2) Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle.

(3) Initial compliance with an applicable emission limit or standard is demonstrated if the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.

Upper Permit Limit: 15 micrograms of D/F TEQ per Mg

Reference Test Method: Method 23

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-20: Establishment of Monitoring and Operating Parameter Values
Effective between the dates of 06/10/2004 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.1511(g), Subpart RRR

Item 1-20.1:

This Condition applies to Emission Unit: 1-FURNS
Process: 001

Item 1-20.2:

Establishment of monitoring and operating parameter values. The owner or operator of new or existing affected sources and emission units must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR Part 63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the owner or operator must use the appropriate procedures in this section and submit the information required by 40 CFR Part 63.1515(b)(4) in the notification of compliance status report. The owner or operator may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the applicable permitting authority:



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

- (1) The complete emission test report(s) used as the basis of the parameter(s) is submitted.
- (2) The same test methods and procedures as required by this subpart were used in the test.
- (3) The owner or operator certifies that no design or work practice changes have been made to the source, process, or emission control equipment since the time of the report.
- (4) All process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

**Condition 1-21: Performance Test/Compliance Demonstration Requirements and Procedures - Feed/Charge Weight Measurement.
Effective between the dates of 06/10/2004 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.1512(k), Subpart RRR

Item 1-21.1:

This Condition applies to Emission Unit: 1-FURNS
Process: 001

Item 1-21.2:

Feed/charge weight measurement. During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the owner or operator of an affected source or emission unit, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format, must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emission unit or affected source instead of the feed/charge weight.

Condition 1-22: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.1517(b)(17), Subpart RRR

Item 1-22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS
Process: 001

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

Item 1-22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Monitoring Description:

The owner or operator of each secondary aluminum processing unit shall record total charge weight for each operating cycle.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



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STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 1-23: Contaminant List

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 1-23.1:

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

CAS No: 001746-01-6

Name: 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

CAS No: 007664-41-7

Name: AMMONIA

CAS No: 0NY100-00-0

Name: HAP

CAS No: 007647-01-0

Name: HYDROGEN CHLORIDE

CAS No: 007664-39-3

Name: HYDROGEN FLUORIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

Condition 1-24: Unavoidable noncompliance and violations

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 1-24.1:

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



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

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 26: Emission Unit Definition

Effective between the dates of 08/31/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 26.1(From Mod 1):

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

Emission Unit: 1-FURNS

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF FOUR (4)



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

22.5 MMBTU/HR NATURAL GAS FIRED ROTARY FURNACES USED TO MELT SCRAP ALUMINUM. EACH FURNACE IS EQUIPPED WITH A BAGHOUSE FOR PARTICULATE CONTROL AND A PH SYSTEM (AMMONIA INJECTION SYSTEM) FOR ACID GAS CONTROL.

Building(s): MAIN

Condition 1-25: Facility Permissible Emissions

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-25.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 007647-01-0 (From Mod 1) PTE: 19,999 pounds per year

Name: HYDROGEN CHLORIDE

Condition 1-26: Capping Monitoring Condition

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.2

Item 1-26.1:

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

6NYCRR 201-6

Item 1-26.2:

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

Item 1-26.3:

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

Item 1-26.4:



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

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

Item 1-26.5:

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

Item 1-26.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 1-26.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In order to reduce facility potential to emit to below title V applicability levels, HCl emissions are limited to less than 10 tons per year, on a 12-month rolling total. Records of metal charged will be kept per batch or heat. HCl emissions will be calculated monthly using the emission factor developed during the March 2003 stack test (0.0418 pounds of HCl per ton of metal charged).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: METAL

Parameter Monitored: HYDROGEN CHLORIDE

Upper Permit Limit: 10 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2005.

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

Condition 16: Air pollution prohibited

Effective between the dates of 08/31/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



Item 16.1:

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

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

Condition 29: Emission Point Definition By Emission Unit
Effective between the dates of 08/31/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 29.1(From Mod 1):

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

Emission Unit: 1-FURNS

Emission Point: 00002

Height (ft.): 47

Diameter (in.): 25

Building: MAIN

Emission Point: 00003

Height (ft.): 47

Diameter (in.): 25

Building: MAIN

Emission Point: 00004

Height (ft.): 47

Diameter (in.): 25

Building: MAIN

Emission Point: 00005

Height (ft.): 47

Diameter (in.): 25

Building: MAIN

Emission Point: 00006

Height (ft.): 47

Diameter (in.): 25

Building: MAIN

Emission Point: 00007

Height (ft.): 47

Diameter (in.): 25

Building: MAIN

Emission Point: 00008



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00009 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00010 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00011 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00012 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00013 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00014 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00015 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00016 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00017 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00018 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00019 Height (ft.): 47	Diameter (in.): 25	Building: MAIN



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Emission Point: 00020 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00021 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00022 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00023 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00024 Height (ft.): 47	Diameter (in.): 25	Building: MAIN
Emission Point: 00001 Height (ft.): 47	Diameter (in.): 25	Building: MAIN

Condition 30: Process Definition By Emission Unit
Effective between the dates of 08/31/1998 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 30.1(From Mod 1):

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

Emission Unit: 1-FURNS

Process: 001

Process Description:

PROCESS 001 CONSISTS OF THE ROTARY FURNACE COMPLEX. THE MELTING (INCLUDING NATURAL GAS COMBUSTION) AND FLUXING OPERATIONS OF THE ROTARY FURNACE COMPLEX. PARTICULATE EMISSIONS ARE CONTROLLED BY A MULTI COMPARTMENT BAGHOUSE. ACID GAS EMISSIONS ARE CONTROLLED BY A PH SYSTEM. THE PH CONTROL SYSTEM INJECTS AMMONIA INTO THE GAS STREAM TO REACT WITH THE ACID GASES GENERATING A PARTICULATE WHICH IS CAPTURED BY THE BAGHOUSE.



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Emission Source/Control: FURN1 - Combustion
Design Capacity: 22.5 million Btu per hour

Emission Source/Control: FURN2 - Combustion
Design Capacity: 22.5 million Btu per hour

Emission Source/Control: FURN3 - Combustion
Design Capacity: 22.5 million Btu per hour

Emission Source/Control: FURN4 - Combustion
Design Capacity: 22.5 million Btu per hour

Emission Source/Control: BAG01 - Control
Control Type: FABRIC FILTER

Emission Source/Control: BAG02 - Control
Control Type: FABRIC FILTER

Emission Source/Control: BAG03 - Control
Control Type: FABRIC FILTER

Emission Source/Control: BAG04 - Control
Control Type: FABRIC FILTER

Emission Source/Control: PHC01 - Control
Control Type: AMMONIA INJECTION

Emission Source/Control: PHC02 - Control
Control Type: AMMONIA INJECTION

Emission Source/Control: PHC03 - Control
Control Type: AMMONIA INJECTION

Emission Source/Control: PHC04 - Control
Control Type: AMMONIA INJECTION

Item 30.2(From Mod 1):

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

Emission Unit: 1-FURNS

Process: 002

Process Description:

PROCESS 002 CONSISTS OF THE POURING AND
CASTING OPERATIONS OF THE ROTARY FURNACE.
ONCE THE DESIRED METAL COMPOSITION IS
ACHIEVED, THE ALUMINUM IS CAST BY POURING
THE MOLTEN METAL INTO MOLDS. EMISSIONS

New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105



FROM THIS OPERATION ARE FUGITIVE IN NATURE (IE., DOORWAYS, WINDOWS, ETC.) NOTE: THE EMISSIONS SHOWN IN THE PROCESS EMISSION SUMMARY REPRESENT ONE FURNACE ONLY.

Emission Source/Control: CAST1 - Process

Emission Source/Control: CAST2 - Process

Emission Source/Control: CAST3 - Process

Emission Source/Control: CAST4 - Process

Item 30.3(From Mod 1):

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

Emission Unit: 1-FURNS

Process: 003

Process Description:

PROCESS 3 CONSISTS OF THE SALT CAKE COOLING AREA OF THE ROTARY FURNACE. DURING MELTING, FLUXING AGENTS ARE ADDED TO THE ROTARY FURNACE. THE FLUX COMBINES WITH CONTAMINANTS IN THE METAL AND FLOATS TO THE SURFACE, TRAPPING THE IMPURITIES IN A SALT CAKE. THE SALT CAKE IS THEN PHYSICALLY REMOVED FROM THE SURFACE AND PLACED IN NEARBY BINS WHERE IT IS ALLOWED TO COOL. EMISSIONS FROM THIS OPERATION ARE FUGITIVE IN NATURE.

Emission Source/Control: SALT1 - Process

Emission Source/Control: SALT2 - Process

Emission Source/Control: SALT3 - Process

Emission Source/Control: SALT4 - Process

Condition 1-27: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 212.4(a)

Item 1-27.1:

The Compliance Demonstration activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 8-4532-00105/00001

Facility DEC ID: 8453200105

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 007664-41-7 AMMONIA

Item 1-27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

THE PH OF THE EXHAUST STREAM FOR EACH FURNACE WILL BE CONTINUOUSLY MONITORED AND RECORDED ON A STRIP CHART RECORDER TO ENSURE PROPER OPERATION OF EACH AMMONIA INJECTION SYSTEM AND VERIFY EXPECTED AMMONIA EMISSION RATES.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-28: Compliance Demonstration

Effective between the dates of 06/10/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 212.4(b)

Item 1-28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 1-28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

THE PH OF THE EXHAUST STREAM FOR EACH FURNACE WILL BE CONTINUOUSLY MONITORED AND RECORDED ON A STRIP CHART RECORDER TO ENSURE PROPER OPERATION OF EACH AMMONIA INJECTION SYSTEM AND VERIFY EXPECTED HYDROGEN CHLORIDE EMISSION RATES.

New York State Department of Environmental Conservation
Permit ID: 8-4532-00105/00001 Facility DEC ID: 8453200105



Monitoring Frequency: CONTINUOUS
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY