

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9060300001**



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-0603-00001/00042  
Effective Date: 06/08/2006                      Expiration Date: No expiration date

Permit Issued To: DUNKIRK SPECIALTY STEEL LLC  
830 BRIGHAM RD  
PO BOX 319  
DUNKIRK, NY 14048-0319

Contact: PAUL A MCGRATH  
600 MAYER ST  
BRIDGEVILLE, PA 15017

Facility: DUNKIRK SPECIALTY STEEL LLC  
830 BRIGHAM RD  
DUNKIRK, NY 14048

Contact: KENNETH KUWIK  
DUNKIRK SPECIALTY STEEL LLC  
830 BRIGHAM RD  
DUNKIRK, NY 14048

**Description:**

Dunkirk Specialty Steel, LLC owns and operates a specialty steel processing facility located at 830 Brigham Road, Dunkirk, New York. The facility receives stainless steel billets as raw material and processes the billets into specialty steel bar, rod, and wire products. The primary manufacturing operations used to process the billets include billet conditioning, rolling, cutting, grinding, straightening, turning, drawing, shaving, coating, annealing, and pickling. Three SIC codes apply to this facility including: 3312 - Blast Furnaces and Steel Mills; 3315 - Steel Wire and Related Products; and 3398- Metal Heat Treating.

**PROJECT DESCRIPTION:**

The current permit action is for the issuance of an Air State Facility Permit for existing air emission sources. The significant sources at Dunkirk Specialty Steel include:

- Reheat and annealing furnaces (process heaters) associated with the Rolling Mill;
- Steel cutting and grinding;
- Pickling operations;
- Combustion sources including boilers, space heaters, and water heaters; and
- Miscellaneous operations including VOC and other storage tanks, wastewater operations, maintenance welding, parts washing, and laboratory operations.



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**EMISSIONS AND CONTROLS:**

The air pollution sources at Dunkirk Specialty Steel emit air pollutants consisting mainly of particulate matter, combustion by-products, and acid vapors. Dunkirk Specialty Steel is a natural minor source of sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), PM-10, and total and individual hazardous air pollutant (HAP) emissions. Dunkirk Specialty Steel is a synthetic minor source of total particulate, carbon monoxide (CO) and nitrogen oxides (NO<sub>x</sub>) emissions.

Particulate emissions are generated primarily from cutting and grinding operations. Many of the particulate sources utilize control equipment to reduce facility-wide emissions to less than 100 tons per year (tpy). The facility has accepted emission limitations on the particulate sources to reduce potential emissions below 80 tpy and avoid Title V permit applicability. This permit precludes the use of four FOX grinders at any time. In addition, the facility is required to operate the particulate control equipment at all times the specific sources are operating. Compliance with this requirement will be completed by an inspection and maintenance program of the particulate control equipment.

Carbon Monoxide emissions are generated from the combustion sources. The maximum potential CO emissions from the combustion sources exceed 100 tpy. The facility has two boilers of which one has not been operational for several years. The reduction of CO emissions from the second boiler reduces the potential facility CO emissions to less than 100 tpy. The facility has agreed to not operate the second boiler at any time and, thus, reduce potential CO emissions below 90 tpy and avoid Title V permit applicability.

Dunkirk Specialty Steel is a potential major source of NO<sub>x</sub> emissions which are emitted from the combustion sources and the nitric acid pickling tank. The facility has limited NO<sub>x</sub> emissions below 90 tons per year to avoid Title V permit applicability and the Reasonably Available Control Technology (RACT) requirements under 6NYCRR Parts 212, 216, and 227-2. The NO<sub>x</sub> RACT emissions cap issued by letter on December 20, 1995, is being incorporated into this permit, and compliance monitoring requirements associated with the cap are being updated to reflect new information and changes in operations since the cap was first instituted.

Acid gas emissions from the pickling process are controlled using a caustic packed tower scrubbing system. An alkaline addition system is used to maintain the proper pH of the system.

**APPLICABLE REQUIREMENTS:**

*6NYCRR Part 201-7 - Federal Enforceable Emission Caps*

Dunkirk Specialty Steel is a synthetic minor source of total particulate, CO and NO<sub>x</sub> emissions. The facility has accepted limitations for each of these contaminants to remain a minor source and avoid Title V applicability.

*6NYCRR Part 212 - General Process Emission Sources:*

The particulate emissions generated during the steel cutting and grinding processes are regulated under 6NYCRR Part 212. These sources are regulated by an opacity limit. In addition, these sources are applicable to an allowable particulate emission rate; however, the emission rates established for the Title V cap are more restrictive. As such, the allowable Part 212 emission rates are superceded by the cap limits and are not contained in this permit.

The acid gas emissions generated from the pickling operations are required to satisfy specific control



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efficiency criteria. Various operating parameters are used to monitor the proper operation of the wet scrubber system to demonstrate compliance with the required removal efficiencies. The monitoring activities include: (1) daily and monthly inspections of the pickling process equipment and the associated control equipment, (2) daily scrubber water flow rate measurements, (3) monthly alarm system inspections, (4) daily scrubber water pH measurements, (5) daily differential pressure measurements across each scrubber media, (6) periodic pH and differential pressure meter calibrations, (7) annual sludge removal from the recirculation pit, (8) annual cleaning of the scrubber nozzles and scrubber system, and (9) annual check of the scrubber packing for solids accumulation.

*6NYCRR Part 216 - Iron and/or Steel Processes:*

The particulate emissions generated from the process furnaces, including annealing furnaces and reheating furnaces, are regulated under 6NYCRR Part 216. These sources are regulated by an opacity limit. In addition, these sources are applicable to an allowable particulate emission rate; however, the emission rates established for the Title V cap are more restrictive. As such, the allowable Part 216 emission rates are superseded by the cap limits and are not contained in this permit.

*6NYCRR Part 226 - Solvent Metal Cleaning Processes:*

The individual solvent metal cleaning devices are each exempt from permitting under 6NYCRR 201-3.2(c)(39). However, 6NYCRR Part 226 requires the facility to satisfy certain operating parameters, such as, properly storing solvent, keeping equipment covered, allowing clean parts to drain properly, maintaining solvent consumption records, and addressing VOC RACT requirements, as needed.

*6NYCRR Parts 212, 216, and 227-2 - NO<sub>x</sub> RACT:*

The facility operates a variety of NO<sub>x</sub>-emitting sources regulated under three separate regulations. The sources and regulations include: (1) acid pickling tanks using nitric acid.- Part 212.10, (2) annealing furnaces - Part 216.5, and (3) two small natural gas fired boilers equipped with low NO<sub>x</sub> burners, several small exempt space heaters, and an exempt emergency generator - Part 227-2. The facility has limited the NO<sub>x</sub> emissions to less than 90 tons per year. Compliance with this requirement is maintained by completing emission calculations based on actual production and usage records.

**NON-APPLICABLE REQUIREMENTS:**

*40 CFR 63 Subpart CCC - National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Generation Plants:*

Dunkirk Specialty Steel is not subject to the above referenced standard because the facility does not use a hydrochloric acid solution in the pickling process. In addition, the facility is a minor source of total and individual HAP emissions.

*40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters:*

Dunkirk Specialty Steel is not subject to the above referenced standard because the facility is a minor source of total and individual HAP emissions.

*40 CFR 63 Subpart EEEEE - National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries:*

Dunkirk Specialty Steel is not subject to the above referenced standard because the facility does not meet the definition of an “iron and steel foundry”. Specifically, the facility does not melt scrap, ingot, and/or other forms of iron and/or steel and pour the resulting molten metal into molds. In addition, the facility is

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a minor source of total and individual HAP emissions.

*40 CFR 64 - Compliance Assurance Monitoring:*

Dunkirk Specialty Steel is not subject to the above referenced standard because the facility is a minor source of emissions.

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:           KENNETH C TAFT  
  DIVISION OF ENVIRONMENTAL PERMITS  
  182 EAST UNION - SUITE 3  
  ALLEGANY, NY 14706-1328

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

**Facility Level**

Submission of Applications for Permit Modification or Renewal -REGION 9  
SUBOFFICE



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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**  
**Applicable State Requirement: ECL 3-0301.2(m)**

**Item 2.1:**

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

**Condition 3: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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

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transfer of ownership.

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

**Item 4.1:**

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

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

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

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9**  
**SUBOFFICE**  
**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 9 Sub-office  
Division of Environmental Permits  
182 E. Union Street  
Allegany, NY 14706-1328  
(716) 372-0645

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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: DUNKIRK SPECIALTY STEEL LLC  
830 BRIGHAM RD  
PO BOX 319  
DUNKIRK, NY 14048-0319

Facility: DUNKIRK SPECIALTY STEEL LLC  
830 BRIGHAM RD  
DUNKIRK, NY 14048

Authorized Activity By Standard Industrial Classification Code:  
3312 - BLAST FURNACES AND STEEL MILLS  
3315 - STEEL WIRE AND RELATED PRODUCTS  
3398 - METAL HEAT TREATING

Permit Effective Date: 06/08/2006

Permit Expiration Date: No expiration date.



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6NYCRR 201-6.5(g): Non Applicable requirements
- 2 6NYCRR 201-7: Facility Permissible Emissions
- \*3 6NYCRR 201-7: Capping Monitoring Condition
- \*4 6NYCRR 201-7: Capping Monitoring Condition
- \*5 6NYCRR 201-7: Capping Monitoring Condition
- \*6 6NYCRR 201-7: Capping Monitoring Condition
- \*7 6NYCRR 201-7: Capping Monitoring Condition
- \*8 6NYCRR 201-7: Capping Monitoring Condition
- \*9 6NYCRR 201-7: Capping Monitoring Condition
- \*10 6NYCRR 201-7: Capping Monitoring Condition
- 11 6NYCRR 212.6(a): Compliance Demonstration

**Emission Unit Level**

**EU=F-00000**

- 12 6NYCRR 212.9(b): Compliance Demonstration
- 13 6NYCRR 212.9(b): Compliance Demonstration
- 14 6NYCRR 212.9(b): Compliance Demonstration
- 15 6NYCRR 212.9(b): Compliance Demonstration
- 16 6NYCRR 212.9(b): Compliance Demonstration
- 17 6NYCRR 212.9(b): Compliance Demonstration
- 18 6NYCRR 212.9(b): Compliance Demonstration

**EU=G-00000**

- 19 6NYCRR 227-1.3(a): Compliance Demonstration

**EU=H-00000**

- 20 6NYCRR 216.4: Compliance Demonstration

**EU=K-00000**

- 21 6NYCRR 226: Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 22 ECL 19-0301: Contaminant List
- 23 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 24 6NYCRR 201-5: Emission Unit Definition
- 25 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 26 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 27 6NYCRR 201-5: Process Definition By Emission Unit

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**NOTE: \* preceding the condition number indicates capping.**



**FEDERALLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

**Item A: Sealing - 6NYCRR Part 200.5**

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

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

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

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

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

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

**Item C: Maintenance of Equipment - 6NYCRR Part 200.7**

Any person who owns or operates an air contamination

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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



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

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

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

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

**Condition 1: Non Applicable requirements**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 1.1:**

ified 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.

40CFR 63-CCC

Reason: Dunkirk Specialty Steel is not subject to "40 CFR 63 Subpart CCC - National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Generation Plants" because the facility does not use a hydrochloric acid solution in the pickling process. In addition, Dunkirk Specialty Steel is a minor source of total and individual HAP emissions.

40CFR 63-DDDDD

Reason: Dunkirk Specialty Steel is not subject to "40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous



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Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters" because the facility is a minor source of total and individual HAP emissions.

40CFR 64

Reason: Dunkirk Specialty Steel is not subject to "40 CFR 64 - Compliance Assurance Monitoring" because the facility is a minor source of emissions.

**Condition 2: Facility Permissible Emissions**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 2.1:**

ceed the following

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

CAS No: 000630-08-0                      PTE: 180,000 pounds per year  
Name: CARBON MONOXIDE

CAS No: 0NY075-00-0                      PTE: 160,000 pounds per year  
Name: PARTICULATES

CAS No: 0NY210-00-0                      PTE: 180,000 pounds per year  
Name: OXIDES OF NITROGEN

**Condition 3: Capping Monitoring Condition**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 3.1:**

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 3.2:**

sion limits, terms,

conditions and standards in this permit.

**Item 3.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a period of five



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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 monitoring requirements, regulations or law.

**Item 3.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all 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 3.5:**

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

**Item 3.6:**

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

Emission Unit: B-00000  
Process: B01                      Emission Source: 00B01

Emission Unit: B-00000  
Process: B01                      Emission Source: 00B04

Emission Unit: B-00000  
Process: B01                      Emission Source: 00B07

Emission Unit: B-00000  
Process: B01                      Emission Source: 00B10

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

**Item 3.7:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1. Dunkirk Specialty Steel is a synthetic minor source of total particulate emissions. The facility has accepted the following emission limitations on the particulate sources to reduce potential emissions below 100 tons per year. In order to maintain emissions below major

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thresholds, the facility is required to operate the settling chambers and wet scrubbers at all times the process equipment is operating. The process sources are required to operate at an hourly particulate emission rate of 3.09 pounds per hour.

2. Compliance with this requirement is maintained through an inspection and maintenance program of each particulate emission source and the associated emission control device. The facility must monitor operation of the particulate control devices by completing the following tasks:

a.) The control device must be operated each time an emission source is being used. Once per shift, while the source is operating, the owner must verify the control device is operating properly. This shall include, but is not limited to, inspection of the control device for evidence that maintenance or replacement is needed.

b.) During each shift, record the following information: date, time, name of person performing the inspection, and inspection results. Whenever a problem is discovered, a description of the problem, cause, and corrective action taken to repair the problem shall be recorded. The records used to document completion of the inspection and maintenance program must be maintained on site and be made available for Department review upon request.

c.) Compliance testing will be conducted at the discretion of the Department to demonstrate compliance with the emission limit.

3. On an annual basis, beginning one year after the granting of the 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.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 3.09 pounds per hour

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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**Facility DEC ID: 9060300001**

The initial report is due 1/30/2007.  
Subsequent reports are due every 12 calendar month(s).

**Condition 4: Capping Monitoring Condition**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 4.1:**

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

6NYCRR 201-6

**Item 4.2:**

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

**Item 4.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a period of five  
thirty days. Environmental 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 4.4:**

In the event 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 all levels that would require compliance with an applicable requirement.

**Item 4.5:**

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

**Item 4.6:**

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

Emission Unit: A-00000  
Process: A01                      Emission Source: 00A09

Emission Unit: A-00000  
Process: A01                      Emission Source: 00A10



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Emission Unit: A-00000

Process: A01

Emission Source: 00A12

Emission Unit: A-00000

Process: A01

Emission Source: 00A13

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. Dunkirk Specialty Steel is a synthetic minor source of total particulate emissions. The facility has accepted the following emission limitations on the particulate sources to reduce potential emissions below 100 tons per year. In order to maintain emissions below major thresholds, the facility shall not operate the four FOX Grinders at any time.
2. Dunkirk Steel must apply for and obtain a permit modification before this equipment can be used in the future.
3. On an annual basis, beginning one year after the granting of the 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.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0 hours

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

**Condition 5: Capping Monitoring Condition**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**New York State Department of Environmental Conservation**

**Permit ID: 9-0603-00001/00042**

**Facility DEC ID: 9060300001**



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

**Item 5.1:**

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

6NYCRR 201-6

**Item 5.2:**

emission limits, terms, conditions and standards in this permit.

**Item 5.3:**

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

**Item 5.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions certification, 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 5.5:**

any activity for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 5.6:**

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

Emission Unit: G-00000  
Process: G01                      Emission Source: 00G02

Regulated Contaminant(s):  
CAS No: 000630-08-0      CARBON MONOXIDE

**Item 5.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes  
Monitoring Type: MONITORING OF PROCESS OR CONTROL

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**Facility DEC ID: 9060300001**



**DEVICE PARAMETERS AS SURROGATE**

**Monitoring Description:**

1. Dunkirk Specialty Steel is a synthetic monitor source of carbon monoxide emissions. The facility has accepted the following emission limitations on the boiler G02 to reduce potential emissions below 100 tons per year. In order to maintain emissions below major thresholds, the facility shall not operate boiler G02 at any time.
  
2. Dunkirk Steel must apply for and obtain a permit modification before this equipment can be used in the future.
  
3. On an annual basis, beginning one year after the granting of the 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.

Parameter Monitored: CARBON MONOXIDE

Upper Permit Limit: 0 hours

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

**Condition 6: Capping Monitoring Condition**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 6.1:**

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

6NYCRR 201-6

**Item 6.2:**

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

**Item 6.3:**

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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 monitoring and enforcement activities, including but not limited to, monitoring, sampling, testing, and record review, for the purpose of determining compliance with the permit conditions, regulations or law.

**Item 6.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all 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.

see a brief summary

**Item 6.5:**

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

**Item 6.6:**

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

- Emission Unit: A-00000  
Process: A01                      Emission Source: 00A01
  
- Emission Unit: A-00000  
Process: A01                      Emission Source: 00A03
  
- Emission Unit: A-00000  
Process: A01                      Emission Source: 00A04
  
- Emission Unit: A-00000  
Process: A01                      Emission Source: 00A05
  
- Emission Unit: A-00000  
Process: A01                      Emission Source: 00A06
  
- Emission Unit: A-00000  
Process: A01                      Emission Source: 00A07
  
- Emission Unit: A-00000  
Process: A01                      Emission Source: 00A15
  
- Emission Unit: A-00000  
Process: A01                      Emission Source: 00A17
  
- Emission Unit: A-00000  
Process: A01                      Emission Source: 00A19



Emission Unit: A-00000  
Process: A01                      Emission Source: 00A21

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

**Item 6.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. Dunkirk Specialty Steel is a synthetic minor source of total particulate emissions. The facility has accepted the following emission limitations on the particulate sources to reduce potential emissions below 100 tons per year. In order to maintain emissions below major thresholds, the facility is required to operate the settling chambers at all times the process equipment is operating. The process sources are required to operate at an hourly particulate emission rate of 0.28 pounds per hour.
2. Compliance with this requirement is maintained through an inspection and maintenance program of each particulate emission source and the associated emission control device. The facility must monitor operation of the particulate control devices by completing the following tasks:
  - a.) The control device must be operated each time an emission source is being used. Once per shift, while the source is operating, the owner must verify the control device is operating properly. This shall include, but is not limited to, inspection of the control device for evidence that maintenance or replacement is needed.
  - b.) During each shift, record the following information: date, time, name of person performing the inspection, and inspection results. Whenever a problem is discovered, a description of the problem, cause, and corrective action taken to repair the problem shall be recorded. The records used to document completion of the inspection and maintenance program must be maintained on site and be made available for Department review upon request.



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c.) Compliance testing will be conducted at the discretion of the Department to demonstrate compliance with the emission limit.

3. On an annual basis, beginning one year after the granting of the 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.

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.28 pounds per hour  
Reference Test Method: EPA Method 5  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2007.  
Subsequent reports are due every 12 calendar month(s).

**Condition 7: Capping Monitoring Condition**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 7.1:**

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

- 6NYCRR 201-6
- 6NYCRR 212.10(d)
- 6NYCRR 216.5(d)
- 6NYCRR 227-2.3(a)(2)

**Item 7.2:**

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

**Item 7.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a period of five months. Environmental 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.

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**Item 7.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions permit, 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 7.5:**

The facility, for which the permit was issued, has obtained an emissions cap, which constitutes a violation of Part 201 and of the Act.

**Item 7.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

**Item 7.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. Unrestricted NOx emissions from the facility are greater than 100 tons per year. As such, without emission capping, the facility would be subject to Title V permitting and to the control requirements of NOx RACT under 6NYCRR Parts 212, 216, and 227-2, due to the variety of NOx-emitting sources at the facility.
2. The facility has accepted a federally enforceable emission limit (cap) to avoid applicability to Title V permitting and to the NOx RACT requirements. Therefore, a NOx emission limit of 90 tons in any consecutive 12-month period is being instituted as part of this permit. Compliance with this limit shall be demonstrated by maintaining monthly records of natural gas and propylene use. Annual calculations of the rolling 12-month total NOx emissions are completed until such time when the annual NOx emissions exceed 65 tpy. Thereafter, the 12-month rolling NOx emissions shall be completed on a monthly basis. The NOx emission calculations are completed using the following equation:  $E(N) = E(1) + E(2) + E(3) + E(4) + E(5)$ , where:

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E(N) is total NO<sub>x</sub> emissions, tons per year.

E(1) is total NO<sub>x</sub> emissions from pickling operations (EP F0157) = 14 tons per year or 1.16 tons per month, based on the assumption that pickling is conducted continuously at the previously measured emission rate of 3.18 pounds per hour.

E(2) is total NO<sub>x</sub> emissions from miscellaneous sources, including diesel-fired emergency generator (exempt), laboratory operations (exempt), and tanks.

Emergency generator NO<sub>x</sub> emissions calculated based on AP-42, to be 3.9 pounds per hour, with operating hours not to exceed 500 hours per year.

Laboratory NO<sub>x</sub> emissions estimated to be 0.24 pounds per hour.

Tank NO<sub>x</sub> emissions estimated to be less than 1 ton per year.

$E(2) = (3.9 \text{ lb/hr} \times 500 \text{ hrs/yr}) + (0.24 \text{ lbs/hr} \times 8760 \text{ hrs/yr}) + 2000 \text{ lbs/yr} = 6,052 \text{ lbs/yr} = 3 \text{ tons/yr}$ , or 0.25 tons/month.

E(3) is the total NO<sub>x</sub> emissions from two Cleaver Brooks boilers (EPs G0176 and G0177).

$E(3) = 0.036 \text{ lbs NO}_x/\text{MM Btu} \times 1050 \text{ Btu/cu.ft.} \times 1 \text{ ton}/2000 \text{ lb} \times \text{NG}(1)$ , where NG(1) is natural gas use by the two boilers, MM (million) cubic feet per year.

E(4) is the total NO<sub>x</sub> emissions from other natural gas-fired combustion sources such as process furnaces and utility heaters.

$E(4) = 0.15 \text{ lbs NO}_x/\text{MM Btu} \times 1050 \text{ Btu/cu.ft.} \times 1 \text{ ton}/2000 \text{ lb} \times \text{NG}(2)$ , where NG(2) is natural gas used by the remainder of the facility, MM (million) cubic feet per year.

E(5) is the NO<sub>x</sub> emissions from propylene-fired furnaces.

$E(5) = 14 \text{ lbs NO}_x/1000 \text{ gallons propylene} \times P$ , where P = propylene use, gallons per year.

3. On an annual basis, beginning one year after the granting of the 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.



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Parameter Monitored: FUEL  
Upper Permit Limit: 90 tons per year  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2007.  
Subsequent reports are due every 12 calendar month(s).

**Condition 8: Capping Monitoring Condition**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 8.1:**

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 8.2:**

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

**Item 8.3:**

or 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 monitoring requirements, regulations or law.

**Item 8.4:**

provide a brief summary

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 of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 8.5:**

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

**Item 8.6:**

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





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sources to reduce potential emissions below 100 tons per year. In order to maintain emissions below major thresholds, the centerless grinders are required to operate at an hourly particulate emission rate of 0.26 pounds per hour.

2. The centerless grinders do not utilize control equipment and, therefore, an inspection and maintenance program does not apply for these sources. Compliance testing will be conducted at the discretion of the Department to demonstrate compliance with the emission limit.

3. On an annual basis, beginning one year after the granting of the 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.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.26 pounds per hour

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

**Condition 9: Capping Monitoring Condition**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 9.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of

lowing applicable

requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

**Item 9.2:**

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



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1. Dunkirk Specialty Steel is a synthetic minor source of total particulate emissions. The facility has accepted the following emission limitations on the particulate sources to reduce potential emissions below 100 tons per year. In order to maintain emissions below major thresholds, the facility is required to operate the fabric filters at all times the process equipment is operating. The process sources are required to operate at an hourly particulate emission rate of 0.001 pounds per hour.

2. Compliance with this requirement is maintained through an inspection and maintenance program of each particulate emission source and the associated emission control device. The facility must monitor operation of the particulate control devices by completing the following tasks:

a.) The control device must be operated each time an emission source is being used. Once per shift, while the source is operating, the owner must verify the control device is operating properly. This shall include, but is not limited to, inspection of the control device for evidence that maintenance or replacement is needed.

b.) During each shift, record the following information: date, time, name of person performing the inspection, and inspection results. Whenever a problem is discovered, a description of the problem, cause, and corrective action taken to repair the problem shall be recorded. The records used to document completion of the inspection and maintenance program must be maintained on site and be made available for Department review upon request.

c.) Compliance testing will be conducted at the discretion of the Department to demonstrate compliance with the emission limit.

3. On an annual basis, beginning one year after the granting of the 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.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.001 pounds per hour

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



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**Facility DEC ID: 9060300001**

**DESCRIPTION**

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

**Condition 10: Capping Monitoring Condition**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 10.1:**

Following applicable

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

6NYCRR 201-6

**Item 10.2:**

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

**Item 10.3:**

Plant representatives

The owner or operator of the permitted facility must maintain all required records on-site for a period of five 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 10.4:**

Limiting 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 levels that would require compliance with an applicable requirement.

**Item 10.5:**

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 10.6:**

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

Emission Unit: H-00000



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|                        |                        |
|------------------------|------------------------|
| Process: H01           | Emission Source: 00H01 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H02 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H03 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H04 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H05 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H06 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H07 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H08 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H09 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H10 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H11 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H12 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H13 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H14 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H15 |
| Emission Unit: H-00000 |                        |
| Process: H01           | Emission Source: 00H16 |



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Emission Unit: H-00000

Process: H02

Emission Source: 00H06

Emission Unit: H-00000

Process: H02

Emission Source: 00H07

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 10.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. Dunkirk Specialty Steel is a synthetic minor source of total particulate emissions. The facility has accepted the following emission limitations on the particulate sources to reduce emissions below 100 tons per year. In order to maintain emissions below major thresholds, the reheat and annealing furnaces are required to operate at 0.01 pounds per million Btu. Although the furnaces are applicable to 6NYCRR Part 216, the limits imposed by the Part 201-6 cap are more restrictive.
2. The reheat and annealing furnaces do not utilize control equipment and, therefore, an inspection and maintenance program does not apply for these sources. Compliance testing will be conducted at the discretion of the Department to demonstrate compliance with the emission limit.
3. On an annual basis, beginning one year after the granting of the 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.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.01 pounds per million Btus

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)



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Reports due 30 days after the reporting period.  
The initial report is due 1/30/2007.  
Subsequent reports are due every 12 calendar month(s).

**Condition 11: Compliance Demonstration**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 11.1:**

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

Emission Unit: A-00000

Emission Unit: B-00000

Emission Unit: C-00000

Emission Unit: D-00000

Emission Unit: E-00000

Emission Unit: F-00000

Emission Unit: I-00000

Emission Unit: J-00000

Emission Unit: K-00000

Emission Unit: L-00000

Emission Unit: M-00000

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

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1.) 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,

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except only the emission of uncombined water.

2.) The Department reserves the right to perform or require the performance of an EPA Method 9 opacity evaluation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 12: Compliance Demonstration**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.9(b)**

**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

CAS No: 007664-93-9 SULFURIC ACID

CAS No: 007697-37-2 NITRIC ACID

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

CAS No: 007664-39-3 HYDROGEN FLUORIDE

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

MONITORING OF pH OF SCRUBBER LIQUOR

Each of the active pickle house scrubbers is required to meet a specific control efficiency for the contaminant(s) it is designed to remove. As a surrogate for direct monitoring of pollutant concentrations in outlet air, the

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pH of the scrubber liquor in the recirculation tank that serves each of the scrubbers is monitored to ensure proper operation of the scrubbers. The scrubber liquor should remain within a pH range of 4 and 9. Measurements outside this range will be an indicator for the facility to investigate any potential problems and complete corrective action (as necessary).

The facility must periodically monitor pH by completing the following tasks:

- 1.) Calibrate and maintain pH measurement device per manufacturer's recommendations.
- 2.) On a monthly basis, inspect the alarm system that is designed to send a visible signal to the pickle house if the pH in the recirculation pit is outside the range of 4 and 9.
- 3.) As part of the daily pre-shift inspection, record the current pH reading, compare to the acceptable range between 4 and 9, and take appropriate steps as needed regarding maintenance, repair, or adjustment in operating practices.
- 4.) Maintain records of the above inspection and maintenance activities. The records shall include the following information: date, time, name of person performing the inspection, and inspection results; and, whenever a problem is discovered, a description of the problem, cause, and corrective action taken. These records shall be maintained for a period of five years and be made available for Department review upon request.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 4 pH (STANDARD) units

Upper Permit Limit: 9 pH (STANDARD) units

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.9(b)**

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**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):

|                     |                    |
|---------------------|--------------------|
| CAS No: 007446-09-5 | SULFUR DIOXIDE     |
| CAS No: 007664-93-9 | SULFURIC ACID      |
| CAS No: 007697-37-2 | NITRIC ACID        |
| CAS No: 0NY210-00-0 | OXIDES OF NITROGEN |
| CAS No: 007664-39-3 | HYDROGEN FLUORIDE  |

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

MONITORING OF DIFFERENTIAL PRESSURE ACROSS  
SCRUBBERS

Each of the active pickle house scrubbers is required to meet a specific control efficiency for the contaminant(s) it is designed to remove. As a surrogate for direct monitoring of pollutant concentrations in outlet air, the differential pressure across each scrubber media is monitored to ensure proper operation of the scrubbers. The differential pressure across the scrubber media should remain between 1.5 and 3.0 inches of water. Measurements outside this range will be an indicator for the facility to investigate any potential problems and complete corrective action (as necessary).

The facility must periodically monitor differential pressure by completing the following tasks:

- 1.) Calibrate and maintain differential pressure measurement devices per manufacturer's recommendations.
- 2.) As part of the daily pre-shift inspection, record the current differential pressure readings for each scrubber, compare to the action level between 1.5 and 3 inches of water, and take appropriate steps as needed regarding maintenance, repair, or adjustment in operating practices.

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3.) Maintain records for the above inspection and maintenance activities. The records shall include the following information: date, time, name of person performing the inspection, and inspection results; and, whenever a problem is discovered, a description of the problem, cause, and corrective action taken. These records shall be maintained for a period of five years and be made available for Department review upon request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1.5 inches of water

Upper Permit Limit: 3 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 14: Compliance Demonstration**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.9(b)**

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):

CAS No: 007664-39-3 HYDROGEN FLUORIDE

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

1. Process FCL includes the pickling of steel products in a mixture of sulfuric acid and hydrofluoric acid in water. The pickling tank associated with this process emits hydrogen fluoride (HF). Acid gas emissions generated during the pickling process are controlled by a caustic packed bed scrubber system.
2. The Department has evaluated the environmental impact of HF emissions using 6NYCRR Part 212 and DAR-1. HF has an environmental rating of B and is a hazardous air



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pollutant (HAP). The emission rate potential (ERP) of the source is less than 10 lb/hr HF. In accordance with Table 2 of 6NYCRR Part 212, the degree of air cleaning shall be specified by the commissioner.

3. A performance test was completed in October, 2005 and demonstrated use of the scrubber system resulted in at least a 89 percent reduction in HF emissions.

4. The Department completed a DAR -1 analysis of the actual HF emissions at maximum production and the analysis demonstrated the impacts off site are below the short term and long term guidance concentrations. As such, the Department specifies a 85% reduction of HF emissions to satisfy 6NYCRR Part 212 and DAR-1 guidance.

Parameter Monitored: HYDROGEN FLUORIDE

Lower Permit Limit: 85 percent reduction by weight

Reference Test Method: EPA Method 26A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 15: Compliance Demonstration**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.9(b)**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

CAS No: 007664-93-9 SULFURIC ACID

CAS No: 007697-37-2 NITRIC ACID

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

CAS No: 007664-39-3 HYDROGEN FLUORIDE

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



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Monitoring Description:

ANNUAL MAINTENANCE

Dunkirk Specialty Steel shall complete regularly scheduled maintenance and repair of the scrubber system to ensure continued proper operation of the equipment. At a minimum, Dunkirk shall complete the following activities:

1. On an annual basis, remove accumulated sludge from the scrubber liquor recirculation pit;
2. On an annual basis, clean the scrubber nozzles and scrubber system; and
3. On an annual basis, check the scrubber packing for the build-up of solids within the bed.

Records of the maintenance activities shall be maintained for a period of five years and include the date, time, name of person performing the inspection, and results of the inspection. Whenever a problem is discovered, a description of the problem and corrective action shall be recorded.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 16: Compliance Demonstration**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.9(b)**

**Item 16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):

|                     |                    |
|---------------------|--------------------|
| CAS No: 007446-09-5 | SULFUR DIOXIDE     |
| CAS No: 007664-93-9 | SULFURIC ACID      |
| CAS No: 007697-37-2 | NITRIC ACID        |
| CAS No: 0NY210-00-0 | OXIDES OF NITROGEN |
| CAS No: 007664-39-3 | HYDROGEN FLUORIDE  |

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

DAILY AND MONTHLY INSPECTIONS

The owner/operator shall conduct daily and monthly inspections to verify proper operation of pickle house equipment, and maintain completed log sheets on site for at least five years. Records should include date, time, name of person performing the inspection, and inspection results for each inspection; and, whenever a problem is discovered, a description of the problem, cause, and corrective action taken.

Daily pre-shift inspections and log sheets shall include, at a minimum, a general check for acid leaks inside the building and outside around the scrubbers and chemical storage tanks; whether hoods over the pickling tanks are in place; scrubber liquor flow rates and differential pressure readings for each scrubber; proper operation of scrubber fans, pumps, and scrubber water flow; and, pH of scrubber water pit.

Monthly inspections and log sheets shall include, at a minimum, inspection of the capture hoods and duct work for each tank, inspection of scrubber nozzles and dispersion over media, blower drive belts, motor belt sheave, blower and motor bearings, motor current draw, demister pad, and water flow alarms.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 17: Compliance Demonstration**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.9(b)**

**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):

CAS No: 007664-93-9 SULFURIC ACID

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**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

1. Process FCL includes the pickling of steel products in a mixture of sulfuric acid and hydrofluoric acid in water. Process FSA includes the pickling of steel products in a solution of sulfuric acid in water. The pickling tanks associated with these processes emit sulfuric acid (H<sub>2</sub>SO<sub>4</sub>). Acid gas emissions generated during the pickling process are controlled by a caustic packed bed scrubber system.
2. The Department has evaluated the environmental impact of H<sub>2</sub>SO<sub>4</sub> emissions using 6NYCRR Part 212 and DAR-1. H<sub>2</sub>SO<sub>4</sub> has an environmental rating of B and is NOT a hazardous air pollutant (HAP). The emission rate potential (ERP) of each source is less than 1 lb/hr H<sub>2</sub>SO<sub>4</sub>. In accordance with Table 2 of 6NYCRR Part 212, the degree of air cleaning shall be specified by the commissioner.
3. A performance test was completed in October, 2005 and demonstrated that the scrubber system caused at least a 50 percent reduction in H<sub>2</sub>SO<sub>4</sub> emissions.
4. The Department completed a DAR -1 analysis of actual H<sub>2</sub>SO<sub>4</sub> emissions at maximum production and the analysis demonstrated the impacts off site are below the short term and long term guidance concentrations. As such, the Department specifies a 45% reduction of H<sub>2</sub>SO<sub>4</sub> emissions to satisfy 6NYCRR Part 212 and DAR-1 guidance.

Parameter Monitored: SULFURIC ACID

Lower Permit Limit: 45 percent reduction by weight

Reference Test Method: EPA Method 8

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 18: Compliance Demonstration**  
**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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**Applicable Federal Requirement: 6NYCRR 212.9(b)**

**Item 18.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):

CAS No: 007446-09-5   SULFUR DIOXIDE

CAS No: 007664-93-9   SULFURIC ACID

CAS No: 007697-37-2   NITRIC ACID

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

CAS No: 007664-39-3   HYDROGEN FLUORIDE

**Item 18.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

MONITORING OF SCRUBBER WATER FLOW RATE

Each of the active pickle house scrubbers is required to meet a specific control efficiency for the contaminant(s) it is designed to remove. As a surrogate for direct monitoring of pollutant concentrations in outlet air, the scrubber water flow rate to each of the scrubbers is monitored to ensure proper operation of the scrubbers. The scrubber water flow rate should remain above 100 gallons per minute (gpm) for effective control. Measurements below this value will be an indicator for the facility to investigate any potential problems and complete corrective action (as necessary).

The facility must periodically monitor the scrubber water flow by completing the following tasks:

- 1.) Calibrate scrubber water flow measurement readout devices per manufacturer's recommendations.
- 2.) On a monthly basis, inspect the alarm system that is designed to send a visible signal to the pickle house if the scrubber water flow in any one of the scrubbers is reduced to less than 100 gpm.
- 3.) As part of the daily pre-shift inspection, record the current scrubber water flow measurement for each scrubber,



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compare to the 100 gpm action level, and take appropriate steps as needed regarding maintenance, repair, or adjustment in operating practices.

4.) Maintain records for the above inspection and maintenance activities. The records shall include the following information: date, time, name of person performing the inspection, and inspection results; and, whenever a problem is discovered, a description of the problem, cause, and corrective action taken. These records shall be maintained for a period of five years and be made available for Department review upon request.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 100 gallons per minute

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 19: Compliance Demonstration**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 227-1.3(a)**

**Item 19.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: G-00000

**Item 19.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall operate the installation in such a way to emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test Method 9 in Appendix A of 40 CFR 60.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9



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Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 20: Compliance Demonstration**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 216.4**

**Item 20.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: H-00000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 20.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- (a) Owners or operators of any iron and/or steel process must not cause or allow emissions from that process to have an opacity, determined by the method of subdivision (b) of this section, which exceeds 20 percent.
- (b) Upon request, compliance with the opacity standards will be determined by observing visible emissions discharged during the operation of the iron and/or steel process. The observer must stand at a distance sufficient to provide a clear view of the visible emissions with the sun oriented in the 140° sector of his back. The opacity of emissions will be computed by averaging the results of 24 consecutive opacity observations made at 15-second intervals. For cyclic processes that generate emissions for less than six minutes per cycle, observations will be made only during the operation of the process when visible emissions are generated. A sufficient number of process cycles must be observed to accumulate the required minimum of 24 consecutive opacity readings.
- (c) The fugitive opacity limits of 20 percent are applicable to emissions emanating from building openings.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 21: Compliance Demonstration**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 226**

**Item 21.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: K-00000

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

6NYCRR 226. Requirements for Cold Cleaning Degreasers  
(Non Title V after 12/31/2003)

**A. Equipment Specifications**

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

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical.
- (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. This does not apply to remote reservoir degreasers.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.

**B. Operating Requirements:**

When cold cleaning, the clean parts must be drained at

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least 15 seconds or until dripping ceases.

**C. General Requirements:**

A Person conducting solvent metal cleaning must:

(1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.

(2) Maintain equipment to minimize leaks and fugitive emissions.

(3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.

(4) Keep the degreaser cover closed except when:

(a) parts are being placed into or being removed from the degreaser;

(b) adding or removing solvent from the degreaser;

(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).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**STATE ONLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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law.

**STATE ONLY APPLICABLE REQUIREMENTS**

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

**Condition 22: Contaminant List**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable State Requirement: ECL 19-0301**

**Item 22.1:**

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

CAS No: 000630-08-0

Name: CARBON MONOXIDE

CAS No: 007664-39-3

Name: HYDROGEN FLUORIDE

CAS No: 007697-37-2

Name: NITRIC ACID

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 007664-93-9

Name: SULFURIC ACID

CAS No: 0NY998-00-0

Name: VOC

**Condition 23: Unavoidable noncompliance and violations**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 23.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary



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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 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 ent, 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 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 g 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 nts 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 nissioner, 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 24: Emission Unit Definition**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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



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**Item 24.1:**

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

Emission Unit: A-00000

Emission Unit Description:

Emission Unit A-00000 consists of steel grinding and cutting operations that generate particulate emissions. Emissions from the process sources are controlled by settling chambers. The following emission sources are included in this emission unit:

EP A0057 - vents Old Plate to Bar Shop Saw 00A01, controlled by settling chamber 00A02

EP A0062 - vents N. Fox Swing Frame Grinders 00A09 and 00A10, controlled by settling chamber 00A11

EP A0063 - vents S. Fox Swing Frame Grinders 00A12 and 00A13, controlled by settling chamber 00A14

EP A0087 - vents N. Fox Abrasive Saw 00A15, controlled by settling chamber 00A16

EP ABFSH - vents Long Bar Saw 00A19, controlled by settling chamber 00A20.

EP ABFS1 - East End Roof Fan - vents East End Abrasive Saw 00A21.

EP A0060 - located in the bar finish and storage building - vents five West End Abrasive Saws (00A03 through 00A07) and their respective settling chambers (00A23 through 00A27)

EP A0174 - located in the Howard Avenue Mills building - vents S. Fox Abrasive Saw 00A17, controlled by settling chamber 00A18

The first four emission points are located in the Howard Avenue Mills building; the last two emission points are located in the bar finish and storage building high bay.

Building(s): BFS  
HAP

**Item 24.2:**

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

Emission Unit: B-00000

Emission Unit Description:

Emission Unit B-00000 includes three CM grinders and a billet saw, each of which is equipped with a settling chamber and wet scrubber for control of particulate emissions. The following emission sources are included in this emission unit: EP B0163 - vents North CM Grinder 00B01, controlled by settling chamber 00B02 and wet scrubber (Rotocone) 00B03



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EP B0164 - vents South CM Grinder 00B04, controlled by settling chamber 00B05 and wet scrubber (Rotocone) 00B06 and vents Abrasive Billet Saw 00B10 controlled by settling chamber 00B11

EP B0167 - vents Center CM Grinder 00B07, controlled by settling chamber 00B08 and wet scrubber (Rotocone) 00B09

All emission points are located in the Brigham Road Plant.

Building(s): BRP

**Item 24.3:**

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

Emission Unit: C-00000

Emission Unit Description:

Emission Unit C-00000 includes steel cutting and grinding operations that are equipped with fabric filters to control particulate emissions. The following emission sources are included in this emission unit:

EP C0180 - located in the Brigham Road Plant - vents the Birdsboro hot abrasive saw 00C03, controlled by fabric filter 00C04

EP CBFSSH - located in the Bar Finish and Storage building high bay - vents Pointer Abrasive Grinder 00C05 (controlled by fabric filter 00C06) and the East End Abrasive Saw 00C07 (controlled by fabric filter 00C08).

As per 6NYCRR Part 201-3.2(c)(18), this emission unit has exempt sources as follows:

EPC0173 vents an exempt grit blast operation (00C01) that is equipped with a fabric filter (00C02).

EP C0182 vents a new exempt coil shot blast operation (00C11) that is equipped with a fabric filter (00C12).

EP C0183 vents a new exempt multi-bar shot blast operation (00C13) that is equipped with a fabric filter (00C14).

Building(s): BFS  
BRP

**Item 24.4:**

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

Emission Unit: D-00000

Emission Unit Description:

Emission unit D-00000 includes ten Centerless Grinders



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(emission sources 00D01 through 00D10), which are located in the Bar Finish & Storage building low bay. The grinders vent to the room, without controls; a roof fan (DBFSL) has been designated as the emission point for these grinders. This emission unit also includes a steel lathe shaver (emission source 00D11) located in the new wire mill building. The steel lathe shaver vents to the room without controls; a roof fan (D0175) has been designated as the emission point for this source.

Building(s):       BFS  
                      WIREMILL

**Item 24.5:**

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

Emission Unit:   E-00000

Emission Unit Description:

Emission unit E-00000 includes the Morgan Koch Wire Drawing Machine (00E01) and an additional wire drawing machine (00E02) each are vented to a Torit Dust Collector (00E02). The emission source is located in the new wire mill building. EP ENWM1 has been designated as the emission point for this source.

Building(s):       WIREMILL

**Item 24.6:**

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

Emission Unit:   F-00000

Emission Unit Description:

Emission Unit F-00000 includes stainless steel pickling operations, which are conducted in the BFS pickle house. The following emission sources are included in this emission unit: EP F0154 - vents sulfuric acid pickling tank 00F01, controlled by scrubber 00F02  
EP F0156 - vents sulfuric acid/hydrofluoric acid pickling tank 00F03, controlled by scrubber 00F04  
EP F0157 - vents nitric acid pickling tank 00F05, controlled by scrubber 00F06  
EP F0158 - vents Vicafil TS408 coating tank 00F09, without controls  
EP F0181 - vents Dynamotive Electrolytic Precleaner 00F07 located in the New Wire Mill Building. The emission point is a roof exhaust fan.

Building(s):       BFSPICKLE  
                      WIREMILL

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**Item 24.7:**

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

Emission Unit: G-00000

Emission Unit Description:

Emission Unit G-00000 includes stationary combustion devices, all of which are exempt except for the following emission sources located in the BFS boiler house: EP G0176 vents a 21 mmbtu/hr Cleaver Brooks natural gas fired boiler constructed in 1979, 00G01  
EP G0177 vents a 21 mmbtu/hr Cleaver Brooks natural gas fired boiler constructed in 1979, 00G02  
The boilers are subject to an opacity standard.

Exempt stationary combustion devices include several heaters, a diesel generator, and boiler relief valves. A list is available at the facility to serve as verification of eligibility for exemption for these sources.

Building(s): BFSBOILR

**Item 24.8:**

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

Emission Unit: H-00000

Emission Unit Description:

Emission Unit H-00000 includes process furnaces (reheat and annealing) located in the Brigham Road Plant, HAP Annealing Bay, HAP Round Mill and HAP Shape Mill. Some of the furnaces vent via stacks and are referred to as "confined" furnaces. The stacks include EPs H0178, H0001 and H0002. Some of the furnaces vent to the room and, ultimately, through nearby roof vents. These furnaces are referred to as "unconfined". The roof vents associated with the unconfined furnaces are identified as emission points H0179, HRMCE, HSMCE, and HANB1. The particulate emissions from the furnaces are subject to 6NYCRR Part 216.

The following are included in this emission unit:

EP H0178 - vents the Rust Furnace, H01 (68.5 mm btu/hr; located in Brigham Road Plant)

EP H0179 - vents the Olson Furnace, H02 ((30.05 mm btu/hr; located in Brigham Road Plant)

EP HANB1 - vents eight unconfined furnaces located in the annealing bay including: GE Roller Hearths H03 (12.8 mm btu/hr) and H04 (15.45 mm btu/hr), Selas 3 Strand Furnace H05 (16 mm btu/hr), four Lindberg furnaces (H06 through H09, each 1 mm btu/hr), and PIE furnace H10 (10 mm



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btu/hr)

EP H0001 - vents confined NW Round Mill Furnace 1, H11 (8 mm btu/hr), located in round mill

EP H0002 - vents confined NE Round Mill Furnace 1, H12 (8 mm btu/hr), located in round mill

EP HRMCE - vents two unconfined S Round Mill Furnaces (16 mm btu/hr), confined SW Round Mill Furnace 2 (H13, 8 mmbtu/hr), confined SE Round Mill Furnace 2 (H14, 8 mmbtu/hr), each located in round mill

EP HSMCE - vents four unconfined Shape Mill Furnaces (32 mm btu/hr), located in shape mill.

Two processes have been defined for this emission unit.

Process H01 consists of the combustion of natural gas, which occurs in all the furnaces in this emission unit.

Process H02 consists of the combustion of propylene, which occasionally occurs in two of the Lindberg Furnaces (H06 and H07).

Building(s):        BRP  
                          HAPANNEAL  
                          ROUNDMILL  
                          SHAPEMILL

**Item 24.9:**

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

Emission Unit:    I-00000

Emission Unit Description:

Emission unit I-00000 consists of various storage tanks for virgin and spent chemicals for the pickling operations, diesel storage tanks, and waste oil and coolant storage tanks. Non-exempt operations are as follows: EP I0001 - vents virgin nitric acid storage tank BFS02 (00I01) (13,000 gallons, vertical) (located outside BFS pickle building)

EP I0002 - vents virgin sulfuric acid storage tank BFS04 (00I02) (13,000 gallons, vertical) (located outside BFS pickle building)

EP I0003 - vents spent H<sub>2</sub>SO<sub>4</sub>/HF storage tank BFS06 (00I05) (13,000 gallons, vertical) (located outside BFS pickle building).

Exempt operations include two horizontal diesel storage tanks (500 and 10,000 gallons, both exempt from 40CFR60 subpart Kb), a 1500 gallon waste oil storage tank, and two 2500 gallon waste coolant/oil storage tanks.



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Building(s): Bfspickle

**Item 24.10:**

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

Emission Unit: J-00000

Emission Unit Description:

Emission unit J-00000 includes oil skimming operations, which are conducted outside so there is no emission point identified. It also includes two equalization tanks, which are located in the waste treatment plant; they are as follows: EP JWTP1 - vents south equalization tank 00J01  
EP JWTP2 - vents north equalization tank 00J02

Building(s): WTP

**Item 24.11:**

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

Emission Unit: K-00000

Emission Unit Description:

Emission unit K-00000 consists of solvent parts washers that use nonchlorinated solvent and are services done routinely by an outside vender such as Heritage Crystal Clean. The individual parts washers, which are located in different buildings throughout the facility, are exempt from permitting under 6NYCRR 201-3.2(c)(39) due to their small capacities; therefore, there are no specific emission points or sources identified for this emission unit. However, the solvent parts washers are subject to certain requirements under 6NYCRR Part 226.

Building(s): BFS  
BRP  
HAP

**Item 24.12:**

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

Emission Unit: L-00000

Emission Unit Description:

Emission Unit L-00000 includes the emissions from several miscellaneous exempt and trivial activities, including welding operations, carpentry shop, and etch room, as well as emissions from oil quench tank 00L07, located in the HAP Annealing Bay. The emission point has been designated LANB2, which vents to the room.

Building(s): HAPANNEAL

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**Item 24.13:**

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

Emission Unit: M-00000

Emission Unit Description:

Emission Unit M-00000 consists of activities that generate fugitive dust emissions, such as wind erosion and vehicle travel on roads. There are no specific emission points or sources identified for this emission unit.

**Condition 25: Air pollution prohibited**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 25.1:**

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, 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 , either alone or in combination with others.

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

**Condition 26: Emission Point Definition By Emission Unit**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 26.1:**

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

Emission Unit: A-00000

Emission Point: A0057

Height (ft.): 41

Diameter (in.): 16

NYTMN (km.): 4711.4

NYTME (km.): 143.2

Building: HAP

Emission Point: A0060

Height (ft.): 44

Diameter (in.): 18

Building: BFS

Emission Point: A0062

Height (ft.): 40

Diameter (in.): 36



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|                       |                    |               |
|-----------------------|--------------------|---------------|
| NYTMN (km.): 4711.4   | NYTME (km.): 143.2 | Building: HAP |
| Emission Point: A0063 |                    |               |
| Height (ft.): 40      | Diameter (in.): 36 |               |
| NYTMN (km.): 4711.4   | NYTME (km.): 143.2 | Building: HAP |
| Emission Point: A0087 |                    |               |
| Height (ft.): 40      | Diameter (in.): 6  |               |
| NYTMN (km.): 4711.4   | NYTME (km.): 143.2 | Building: HAP |
| Emission Point: A0174 |                    |               |
| Height (ft.): 40      | Diameter (in.): 8  |               |
|                       |                    | Building: HAP |
| Emission Point: ABFS1 |                    |               |
| Height (ft.): 53      | Diameter (in.): 70 |               |
|                       |                    | Building: BFS |
| Emission Point: ABFSH |                    |               |
| Height (ft.): 39      | Diameter (in.): 12 |               |
|                       |                    | Building: BFS |

**Item 26.2:**

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

|                        |                    |               |
|------------------------|--------------------|---------------|
| Emission Unit: B-00000 |                    |               |
| Emission Point: B0163  |                    |               |
| Height (ft.): 44       | Diameter (in.): 23 |               |
| NYTMN (km.): 4711.4    | NYTME (km.): 143.2 | Building: BRP |
| Emission Point: B0164  |                    |               |
| Height (ft.): 44       | Diameter (in.): 23 |               |
| NYTMN (km.): 4711.4    | NYTME (km.): 143.2 | Building: BRP |
| Emission Point: B0167  |                    |               |
| Height (ft.): 32       | Diameter (in.): 18 |               |
| NYTMN (km.): 4711.4    | NYTME (km.): 143.2 | Building: BRP |

**Item 26.3:**

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

|                        |                    |               |
|------------------------|--------------------|---------------|
| Emission Unit: C-00000 |                    |               |
| Emission Point: C0180  |                    |               |
| Height (ft.): 42       | Diameter (in.): 18 |               |
| NYTMN (km.): 4711.4    | NYTME (km.): 143.2 | Building: BRP |

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Emission Point: CBFSH  
Height (ft.): 53                      Diameter (in.): 70  
NYTMN (km.): 4711.4              NYTME (km.): 143.2              Building: BFS

**Item 26.4:**

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

Emission Unit: D-00000

Emission Point: D0175  
Height (ft.): 9                      Diameter (in.): 6  
NYTMN (km.): 4711.4              NYTME (km.): 143.2              Building: WIREMILL

Emission Point: DBFSL  
Height (ft.): 41                      Diameter (in.): 54  
NYTMN (km.): 4711.4              NYTME (km.): 143.2              Building: BFS

**Item 26.5:**

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

Emission Unit: E-00000

Emission Point: ENWM1  
Height (ft.): 30                      Length (in.): 36                      Width (in.): 36  
NYTMN (km.): 4711.4              NYTME (km.): 143.2              Building: WIREMILL

**Item 26.6:**

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

Emission Unit: F-00000

Emission Point: F0154  
Height (ft.): 54                      Diameter (in.): 36  
NYTMN (km.): 4711.4              NYTME (km.): 143.2              Building: BFSPICKLE

Emission Point: F0156  
Height (ft.): 54                      Diameter (in.): 36  
NYTMN (km.): 4711.4              NYTME (km.): 143.2              Building: BFSPICKLE

Emission Point: F0157  
Height (ft.): 54                      Diameter (in.): 36  
NYTMN (km.): 4711.4              NYTME (km.): 143.2              Building: BFSPICKLE

Emission Point: F0181  
Height (ft.): 38                      Diameter (in.): 10  
Building: WIREMILL

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**Item 26.7:**

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

Emission Unit: G-00000

Emission Point: G0176

Height (ft.): 6                      Diameter (in.): 24  
NYTMN (km.): 4711.4      NYTME (km.): 143.2      Building: BFSBOILR

Emission Point: G0177

Height (ft.): 6                      Diameter (in.): 24  
NYTMN (km.): 4711.4      NYTME (km.): 143.2      Building: BFSBOILR

**Item 26.8:**

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

Emission Unit: H-00000

Emission Point: H0001

Height (ft.): 15                      Diameter (in.): 30  
NYTMN (km.): 4711.4      NYTME (km.): 143.2      Building: ROUNDMILL

Emission Point: H0002

Height (ft.): 15                      Diameter (in.): 30  
NYTMN (km.): 4711.4      NYTME (km.): 143.2      Building: HAPANNEAL

Emission Point: H0178

Height (ft.): 125                      Diameter (in.): 44  
NYTMN (km.): 4711.4      NYTME (km.): 143.2      Building: BRP

Emission Point: H0179

Height (ft.): 42                      Diameter (in.): 24  
NYTMN (km.): 4711.4      NYTME (km.): 143.2      Building: BRP

Emission Point: HANB1

Height (ft.): 67                      Diameter (in.): 48  
NYTMN (km.): 4711.4      NYTME (km.): 143.2      Building: HAPANNEAL

Emission Point: HRMCE

Height (ft.): 60                      Length (in.): 24                      Width (in.): 24  
NYTMN (km.): 4711.4      NYTME (km.): 143.2      Building: ROUNDMILL

Emission Point: HSMCE

Height (ft.): 60                      Length (in.): 1560                      Width (in.): 24  
NYTMN (km.): 4711.4      NYTME (km.): 143.2      Building: SHAPEMILL



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**Item 26.9:**

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

Emission Unit: I-00000

Emission Point: I0001

Height (ft.): 10

Diameter (in.): 3

NYTMN (km.): 4711.4

NYTME (km.): 143.2

Building: BFSPICKLE

Emission Point: I0002

Height (ft.): 10

Diameter (in.): 3

NYTMN (km.): 4711.4

NYTME (km.): 143.2

Building: BFSPICKLE

Emission Point: I0003

Height (ft.): 10

Diameter (in.): 3

NYTMN (km.): 4711.4

NYTME (km.): 143.2

Building: BFSPICKLE

**Item 26.10:**

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

Emission Unit: J-00000

Emission Point: JWTP1

Height (ft.): 30

Diameter (in.): 36

NYTMN (km.): 4711.4

NYTME (km.): 143.2

Building: WTP

Emission Point: JWTP2

Height (ft.): 30

Diameter (in.): 36

NYTMN (km.): 4711.4

NYTME (km.): 143.2

Building: WTP

**Item 26.11:**

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

Emission Unit: L-00000

Emission Point: LANB2

Height (ft.): 3

Diameter (in.): 3

NYTMN (km.): 4711.4

NYTME (km.): 143.2

Building: HAPANNEAL

**Condition 27: Process Definition By Emission Unit**

**Effective between the dates of 06/08/2006 and Permit Expiration Date**

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

**Item 27.1:**

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

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Emission Unit: A-00000

Process: A01

Source Classification Code: 3-03-009-12

Process Description:

This process includes steel grinding and cutting operations that generate particulate emissions and are controlled by settling chambers.

Emission Source/Control: 00A02 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A08 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A11 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A14 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A16 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A18 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A20 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A22 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A23 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A24 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A25 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A26 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A27 - Control

Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A01 - Process



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Emission Source/Control: 00B08 - Control  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00B09 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 00B11 - Control  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00B01 - Process

Emission Source/Control: 00B04 - Process

Emission Source/Control: 00B07 - Process

Emission Source/Control: 00B10 - Process

**Item 27.3:**

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

Emission Unit: C-00000

Process: C01

Source Classification Code: 3-03-009-12

Process Description:

This process includes steel cutting and grinding operations that are equipped with fabric filters.

Emission Source/Control: 00C04 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 00C06 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 00C08 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 00C03 - Process

Emission Source/Control: 00C05 - Process

Emission Source/Control: 00C07 - Process

**Item 27.4:**

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

Emission Unit: D-00000

Process: D01

Source Classification Code: 3-03-009-12



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**Process Description:**

This process includes the Centerless grinders and the wire shaver, all of which vent to the room without controls.

Emission Source/Control: 00D01 - Process

Emission Source/Control: 00D02 - Process

Emission Source/Control: 00D03 - Process

Emission Source/Control: 00D04 - Process

Emission Source/Control: 00D05 - Process

Emission Source/Control: 00D06 - Process

Emission Source/Control: 00D07 - Process

Emission Source/Control: 00D08 - Process

Emission Source/Control: 00D09 - Process

Emission Source/Control: 00D10 - Process

Emission Source/Control: 00D11 - Process

**Item 27.5:**

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

Emission Unit: E-00000

Process: EE1

Source Classification Code: 3-03-009-12

**Process Description:**

This process includes a wire drawing machine vented through a dust collector.

Emission Source/Control: 00E04 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00E01 - Process

Emission Source/Control: 00E02 - Process

**Item 27.6:**

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

Emission Unit: F-00000

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Process: DYN  
Process Description: Dynamotive Electrolytic Precleaner.

Emission Source/Control: 00DYN - Process

Emission Source/Control: 00F07 - Process

**Item 27.7:**

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

Emission Unit: F-00000  
Process: FCL  
Source Classification Code: 3-03-009-10

Process Description:

This process is for the pickling of steel products in a mixture of sulfuric acid [approximately 12 - 18%], hydrofluoric acid [approximately 1 - 2%], and water. Work loads of approximately 12,000 pounds are immersed in the bath. The pickling bath is identified as emission source 00F03. Sulfuric acid and hydrofluoric acid emissions are vented to a wet scrubber (emission source 00F04) to control emissions. The scrubber exhausts through emission point F0156.

Emission Source/Control: 00F04 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 00F03 - Process

**Item 27.8:**

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

Emission Unit: F-00000  
Process: FNA  
Source Classification Code: 3-03-009-10

Process Description:

This process is for the pickling of steel products in nitric acid (emission source 00F05) in work loads of approximately 12,000 pounds by immersion in a tank containing a solution of approximately 30% nitric acid. Nitric acid emissions are vented to a wet scrubber (emission source 00F06) to control emissions. The scrubber exhausts through emission point F0157.

Emission Source/Control: 00F06 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 00F05 - Process



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**Item 27.9:**

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

Emission Unit: F-00000

Process: FSA

Source Classification Code: 3-03-009-10

Process Description:

This process is for the pickling of steel bars in sulfuric acid in work loads of approximately 12,000 pounds by immersion in a bath containing a 20% solution of sulphuric acid heated to a temperature of 180 deg. F. Sulfuric acid emissions are vented to a wet scrubber (emission source 00F02) to control emissions. The scrubber exhausts through emission point F0154.

Emission Source/Control: 00F02 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 00F01 - Process

**Item 27.10:**

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

Emission Unit: G-00000

Process: G01

Source Classification Code: 1-03-006-02

Process Description:

This process is for the combustion of natural gas in the two non-exempt 21 mm Btu/hr boilers, emission sources G01 and G02.

Emission Source/Control: 00G01 - Combustion

Emission Source/Control: 00G02 - Combustion

**Item 27.11:**

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

Emission Unit: H-00000

Process: H01

Source Classification Code: 3-90-006-89

Process Description:

The process consists of the combustion of natural gas in the process furnaces that are part of this emission unit.

Emission Source/Control: 00H01 - Process

Emission Source/Control: 00H02 - Process

Emission Source/Control: 00H03 - Process



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Emission Source/Control: 00H04 - Process

Emission Source/Control: 00H05 - Process

Emission Source/Control: 00H06 - Process

Emission Source/Control: 00H07 - Process

Emission Source/Control: 00H08 - Process

Emission Source/Control: 00H09 - Process

Emission Source/Control: 00H10 - Process

Emission Source/Control: 00H11 - Process  
Design Capacity: 8 million Btu per hour

Emission Source/Control: 00H12 - Process  
Design Capacity: 8 million Btu per hour

Emission Source/Control: 00H13 - Process  
Design Capacity: 8 million Btu per hour

Emission Source/Control: 00H14 - Process  
Design Capacity: 8 million Btu per hour

Emission Source/Control: 00H15 - Process  
Design Capacity: 16 million Btu per hour

Emission Source/Control: 00H16 - Process

**Item 27.12:**

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

Emission Unit: H-00000

Process: H02

Source Classification Code: 3-90-007-98

Process Description:

The process consists of the combustion of propylene in two of the Lindberg furnaces, H06 and H07.

Emission Source/Control: 00H06 - Process

Emission Source/Control: 00H07 - Process

**Item 27.13:**

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

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Emission Unit: I-00000

Process: I01

Source Classification Code: 3-03-009-98

Process Description:

This process includes the three non-exempt chemical storage tanks associated with the pickling processes.

Emission Source/Control: 00I01 - Process

Design Capacity: 13,000 gallons

Emission Source/Control: 00I02 - Process

Design Capacity: 13,000 gallons

Emission Source/Control: 00I03 - Process

Design Capacity: 13,000 gallons

**Item 27.14:**

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

Emission Unit: J-00000

Process: J01

Source Classification Code: 3-03-009-98

Process Description:

This process includes the oil skimming operations and wastewater equalization tanks.

Emission Source/Control: 00J01 - Process

Emission Source/Control: 00J02 - Process

**Item 27.15:**

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

Emission Unit: K-00000

Process: K01

Source Classification Code: 3-03-009-98

Process Description:

This process includes the nonchlorinated solvent parts washers located throughout the facility.

Emission Source/Control: KMISC - Process

**Item 27.16:**

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

Emission Unit: L-00000

Process: L01

Source Classification Code: 3-03-009-98

Process Description:

This process includes several miscellaneous and exempt

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activities, including welding, carpentry shop, and etch room, as well as emissions from oil quench tank 00L07.

Emission Source/Control: 00L07 - Process

**Item 27.17:**

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

Emission Unit: M-00000

Process: M01

Source Classification Code: 3-03-009-98

Process Description:

This process includes activities that generate fugitive dust emissions, such as wind erosion and vehicle travel on roads around the facility.

Emission Source/Control: MMISC - Process