



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-0603-00001/00042  
Mod 0 Effective Date: 06/08/2006 Expiration Date: 06/07/2016  
Mod 1 Effective Date: 09/30/2008 Expiration Date: No expiration date.  
Mod 2 Effective Date: 06/14/2013 Expiration Date: 06/07/2016

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  
(412) 257-7603

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

Contact: KENNETH KUWIK  
DUNKIRK SPECIALTY STEEL LLC  
830 BRIGHAM RD  
DUNKIRK, NY 14048  
(716) 366-1000

Description:  
Dunkirk Specialty Steel, LLC has requested a modification to the existing permit as follows:

- (1) Removal of emission source G02, a Cleaver Brooks boiler which has been decommissioned;
- (2) Addition of two (2) existing emergency generators that are now subject to 40 CFR 63 Subpart ZZZZ. Permit conditions for 40 CFR 63 Subpart ZZZZ were added to the permit;
- (3) Correction to the capacity size of the four Round Mill furnaces (Emission sources H11 through H14) and the four Shape Mill furnaces (existing Emission sources H15 and H16 and new emission sources H1502 and H1602);
- (4) Changed the required annual maintenance shut down of the scrubber to an as-needed basis;
- (5) Addition of a performance test requirement and modeling impact evaluation of the pickling process to evaluate the performance and compliance with ambient air quality standards and required control efficiencies. The performance test shall be completed once during the term of



this permit modification prior to June 7, 2016. The last performance test was completed in October, 2005;

- (6) Updated the NOx cap emission equation to reflect the change in combustion sources; and
- (7) Removal of the carbon monoxide and particulate emission caps due to facility potential to emit values are less than 100 ton per year for these contaminants based on removal of combustion sources and re-calculation of emission estimates.

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:           LISA PORTER  
                                          270 MICHIGAN AVE  
                                          BUFFALO, NY 14203-2915

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



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

- Submission of Applications for Permit Modification or Renewal
  - REGION 9 SUBOFFICE
- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



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

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

**Condition 2-1: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 2-1.1:**

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

**Item 2-1.2:**

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

**Item 2-1.3:**

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



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

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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

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

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 2-2.1:**

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

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

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

**Item 4.1:**

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

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



e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

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

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9  
SUBOFFICE**

**Applicable State Requirement: 6 NYCRR 621.5 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Sub-office  
Division of Environmental Permits  
182 E. Union Street  
Allegany, NY 14706-1328  
(716) 372-0645

**Condition 2-3: Submission of application for permit modification or  
renewal-REGION 9**

**HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 2-3.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-0603-00001/00042

Facility DEC ID: 9060300001



**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

Mod 0 Permit Effective Date: 06/08/2006

Permit Expiration Date: 06/07/2016

Mod 2 Permit Effective Date: 06/14/2013

Permit Expiration Date: 06/07/2016



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 2-1 6 NYCRR 201-7.1: Facility Permissible Emissions
- \*2-2 6 NYCRR 201-7.1: Capping Monitoring Condition
- 2-3 6 NYCRR 211.1: Air pollution prohibited
- 11 6 NYCRR 212.6 (a): Compliance Demonstration

#### Emission Unit Level

##### EU=F-00000

- 2-4 6 NYCRR 212.9 (b): Compliance Demonstration
- 2-5 6 NYCRR 212.9 (b): Compliance Demonstration
- 2-6 6 NYCRR 212.9 (b): Compliance Demonstration
- 2-7 6 NYCRR 212.9 (b): Compliance Demonstration
- 12 6 NYCRR 212.9 (b): Compliance Demonstration
- 13 6 NYCRR 212.9 (b): Compliance Demonstration
- 16 6 NYCRR 212.9 (b): Compliance Demonstration
- 18 6 NYCRR 212.9 (b): Compliance Demonstration

##### EU=G-00000

- 19 6 NYCRR 227-1.3 (a): Compliance Demonstration
- 2-8 40CFR 63.6603(a), Subpart ZZZZ: Compliance Demonstration
- 2-9 40CFR 63.6625, Subpart ZZZZ: Compliance Demonstration
- 2-10 40CFR 63.6640, Subpart ZZZZ: Compliance Demonstration
- 2-11 40CFR 63.6655, Subpart ZZZZ: Compliance Demonstration

##### EU=H-00000

- 20 6 NYCRR 216.4: Compliance Demonstration

##### EU=K-00000

- 21 6 NYCRR Part 226: Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 22 ECL 19-0301: Contaminant List
- 2-12 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 2-13 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 24 6 NYCRR Subpart 201-5: Emission Unit Definition
- 2-14 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 2-15 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 2-16 6 NYCRR 211.2: Visible Emissions Limited

#### Emission Unit Level

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

NOTE: \* preceding the condition number indicates capping.



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

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



required to operate such device effectively.

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

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



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

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

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

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

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

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

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

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

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

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



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

**Item K: Open Fires Prohibitions - 6 NYCRR 215.2**  
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item L: Permit Exclusion - ECL 19-0305**  
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

**Condition 2-1: Facility Permissible Emissions**



Effective between the dates of 06/14/2013 and 06/07/2016

Applicable Federal Requirement:6 NYCRR 201-7.1

**Item 2-1.1:**

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

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

CAS No: 0NY210-00-0 (From Mod 2) PTE: 180,000 pounds  
per year

Name: OXIDES OF NITROGEN

**Condition 2-2: Capping Monitoring Condition**

Effective between the dates of 06/14/2013 and 06/07/2016

Applicable Federal Requirement:6 NYCRR 201-7.1

**Item 2-2.1:**

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

6 NYCRR Subpart 201-6

6 NYCRR 212.10 (d)

6 NYCRR 216.5 (d)

6 NYCRR 227-2.3

**Item 2-2.2:**

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

**Item 2-2.3:**

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

**Item 2-2.4:**

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

**Item 2-2.5:**

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



the Act.

**Item 2-2.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

**Item 2-2.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

(1) Unrestricted NO<sub>x</sub> 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 NO<sub>x</sub> RACT under 6NYCRR Parts 212, 216, and 227-2, due to the variety of NO<sub>x</sub>-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 NO<sub>x</sub> RACT requirements. Therefore, a NO<sub>x</sub> 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 NO<sub>x</sub> emissions are completed until such time when the annual NO<sub>x</sub> emissions exceed 65 tpy. Thereafter, the 12-month rolling NO<sub>x</sub> emissions shall be completed on a monthly basis. The NO<sub>x</sub> emission calculations are completed using the following equation:  $E(N) = E(1) + E(2) + E(3) + E(4) + E(5)$ , where:

$E(N)$  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 laboratory operations (exempt), and tanks.

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.



$E(2) = (0.24 \text{ lbs/hr} \times 8760 \text{ hrs/yr}) + 2000 \text{ lbs/yr} = 4,102$   
 $\text{lbs/yr} = 2.05 \text{ tons/yr.}$

E(3) is the total NOx emissions from two natural gas fired emergency generators.

Emergency generator NOx emissions, calculated based on AP-42, is 5.85 pounds per hour each.

$E(3) = (5.85 \text{ lb/hr} \times \text{EH})/2000$ , where EH are the total hours of operation of the two emergency generators.

E(4) is the total NOx emissions from other combustion sources.

$E(4) = 0.15 \text{ lbs NOx}/106\text{Btu} \times 1050 \text{ Btu/cu.ft.} \times 1 \text{ ton}/2000$   
 $\text{lb} \times \text{NG}$ , where NG is natural gas used by the remainder of the facility, 106 cubic feet per year.

E(5) are the NOx emissions from the propylene-fired furnaces.

$E(5) = 14 \text{ lbs NOx}/1000 \text{ gallons propylene} \times P$ , where P = propylene use in 1000 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.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 90 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL TOTAL

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

**Condition 2-3: Air pollution prohibited**  
**Effective between the dates of 06/14/2013 and 06/07/2016**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 2-3.1:**

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



**Condition 11: Compliance Demonstration**  
Effective between the dates of 06/08/2006 and 06/07/2016

**Applicable Federal Requirement:6 NYCRR 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, 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 2-4: Compliance Demonstration**  
Effective between the dates of 06/14/2013 and 06/07/2016

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

**Replaces Condition(s) 17**

**Item 2-4.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):

CAS No: 007664-93-9      SULFURIC ACID

**Item 2-4.2:**

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 most recent performance test was completed in October, 2005 and demonstrated that the scrubber system resulted in a 50 percent reduction in H<sub>2</sub>SO<sub>4</sub> emissions. An additional performance test is required once during the term of this permit.
- (3) An evaluation of the environmental impact of H<sub>2</sub>SO<sub>4</sub> emissions was completed 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.



(4) A DAR -1 analysis of actual H<sub>2</sub>SO<sub>4</sub> emissions at maximum production was completed 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: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-5: Compliance Demonstration**  
**Effective between the dates of 06/14/2013 and 06/07/2016**

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

**Item 2-5.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):

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

**Item 2-5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

EMISSION TESTING AND IMPACT EVALUATION

(1) A performance test of the packed bed scrubber system must be completed once during the term of this permit modification to evaluate the performance and compliance with current ambient air quality standards and required control efficiencies.

(2) The performance test must be conducted at the maximum normal operating process load.

(3) You must re-establish the control parameter limits, including: (a) the scrubber effluent pH, (b) scrubber liquid flowrate, and (c) pressure drop, as your operating



limits during the three-run performance test.

(4) You must collect pH, pressure drop, and liquid flow-rate data every 15 minutes during the entire period of the performance tests.

(5) You must determine the average pH, pressure drop, and liquid flow-rate for each individual test run in the three-run performance test by computing the average of all the 15-minute readings taken during each test run. The hourly averages shall be used to re-establish the operating limits for the scrubber system.

(6) A performance test protocol shall be submitted to the Department for approval at least 60 days prior to completion of the test. The Department must be notified 10 days prior to the scheduled test date so a Department representative may be present during the test.

(7) The results of the performance test shall be submitted to the Department within 60 days following completion of the performance test.

(8) A review of the measured control parameters, including the pH, pressure, and flow rate, shall be submitted to the Department within 60 days following completion of the performance test. The review shall re-establish the operating and monitoring limits for this emission source.

(9) You must complete a DAR-1 analysis and AERSREEN modeling evaluation to determine the necessary capture and control efficiencies required to satisfy the ambient air quality standards and the short-term and annual guidance impact levels. The evaluation must include uncaptured emissions.

(10) If the operating and monitoring limits have changed based on the performance test and modeling analysis, then you must update the permit to reflect the changes.

(11) Subsequent performance test requirements will be at the discretion of the Department based on design, operation and maintenance practices used to minimize the impact of excess emissions on ambient air quality, the environment and human health.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-6: Compliance Demonstration**  
**Effective between the dates of 06/14/2013 and 06/07/2016**



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

**Replaces Condition(s) 14**

**Item 2-6.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):  
CAS No: 007664-39-3 HYDROGEN FLUORIDE

**Item 2-6.2:**

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 most recent performance test was completed in October, 2005 and demonstrated the scrubber system resulted in an 89 percent (%) reduction in HF emissions. An additional performance is required once during the term of this permit.
- (3) An evaluation of the environmental impact of HF emissions was completed using 6NYCRR Part 212 and DAR-1. HF has an environmental rating of B and is a hazardous air 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.
- (4) A DAR -1 analysis of the actual HF emissions at maximum production was completed and the analysis demonstrated the impacts off site are below the short term and long term guidance concentrations. As such, the Department specifies an 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: ONCE DURING THE TERM OF THE PERMIT  
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

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Facility DEC ID: 9060300001



METHOD INDICATED  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-7: Compliance Demonstration**  
Effective between the dates of 06/14/2013 and 06/07/2016

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

**Replaces Condition(s) 15**

**Item 2-7.1:**

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 2-7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

REGULAR SCHEDULED 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 Steel shall complete the following activities on an as-needed basis:

- (1) Remove accumulated sludge from the scrubber liquor recirculation pit;
- (2) Clean the scrubber nozzles and scrubber system;
- (3) Check the scrubber packing for the build-up of solids within the bed; and
- (4) 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: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 12: Compliance Demonstration**  
Effective between the dates of 06/08/2006 and 06/07/2016

**Applicable Federal Requirement: 6 NYCRR 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 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 06/07/2016**  
**Applicable Federal Requirement:6 NYCRR 212.9 (b)**

**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.
- 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 16: Compliance Demonstration**  
**Effective between the dates of 06/08/2006 and 06/07/2016**

**Applicable Federal Requirement: 6 NYCRR 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: 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, 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.

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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 06/07/2016**

**Applicable Federal Requirement:6 NYCRR 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

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-8: Compliance Demonstration**  
**Effective between the dates of 06/14/2013 and 06/07/2016**

**Applicable Federal Requirement:40CFR 63.6603(a), Subpart ZZZZ**

**Item 2-8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: G-00000

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

CAS No: 0NY100-00-0 HAP

**Item 2-8.2:**



Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No later than May 3, 2013, Dunkirk Specialty Steel must operate the emergency engines as follows:

- (1) Change oil and filter every 1,440 hours of operation or annually, whichever comes first;
- (2) Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first; and
- (3) Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-9: Compliance Demonstration**  
**Effective between the dates of 06/14/2013 and 06/07/2016**

**Applicable Federal Requirement:40CFR 63.6625, Subpart ZZZZ**

**Item 2-9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: G-00000

Regulated Contaminant(s):

CAS No: 000630-08-0	CARBON MONOXIDE
CAS No: 0NY100-00-0	HAP

**Item 2-9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No later than May 3, 2013, Dunkirk Specialty Steel must operate the emergency engines as follows:

- (1) Operate and maintain the engine per manufacturer's instructions or owner-developed maintenance plan;
- (2) Install a non-resettable hour meter if one is not already installed;
- (3) Minimize the engine's time spent at idle during startup and minimize the engine's startup time, not to exceed 30 minutes; and



(4) An oil analysis program may be used instead of the prescribed oil change frequency, as allowed in § 63.6625(j).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-10: Compliance Demonstration**  
**Effective between the dates of 06/14/2013 and 06/07/2016**

**Applicable Federal Requirement:40CFR 63.6640, Subpart ZZZZ**

**Item 2-10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: G-00000

Regulated Contaminant(s):

CAS No: 000630-08-0	CARBON MONOXIDE
CAS No: 0NY100-00-0	HAP

**Item 2-10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No later than May 3, 2013, Dunkirk Specialty Steel must operate the emergency engines as follows:

- (1) There are no limits on hours of operation for emergency service;
- (2) Maintenance checks and readiness testing is limited to 100 hours per year;
- (3) Operate the emergency engine up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing;
- (4) Engine cannot be used for peak shaving or as part of financial arrangement with another entity, except 15 of the 50 non-emergency hrs/yr can be used for demand response in emergency situations (e.g., imminent blackout); and
- (5) If you do not operate the engine according to the regulation, the engine will not be considered an emergency engine and will need to meet all requirements for non-emergency engines.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-11: Compliance Demonstration**

**Effective between the dates of 06/14/2013 and 06/07/2016**

**Applicable Federal Requirement:40CFR 63.6655, Subpart ZZZZ**

**Item 2-11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: G-00000

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

CAS No: 0NY100-00-0 HAP

**Item 2-11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No later than May 3, 2013, Dunkirk Specialty Steel must operate the emergency engines as follows:

- (1) Keep records of the maintenance conducted on the emergency engine in order to demonstrate that you operated and maintained the engine according to your own maintenance plan;
- (2) Keep records of the occurrence and duration of each malfunction of operation;
- (3) Keep records of actions taken during periods of malfunction to minimize emissions, including corrective actions; and
- (4) Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for demand response operation, you must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response;

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION



Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 20: Compliance Demonstration**  
**Effective between the dates of 06/08/2006 and 06/07/2016**

**Applicable Federal Requirement:6 NYCRR 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

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 06/07/2016

**Applicable Federal Requirement: 6 NYCRR Part 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 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 - 6 NYCRR 201-1.10 (a)**

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

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

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

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

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



**Condition 22: Contaminant List**

**Effective between the dates of 06/08/2006 and 06/07/2016**

**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: 007446-09-5  
Name: SULFUR DIOXIDE

CAS No: 007664-39-3  
Name: HYDROGEN FLUORIDE

CAS No: 007664-93-9  
Name: SULFURIC ACID

CAS No: 007697-37-2  
Name: NITRIC ACID

CAS No: 0NY075-00-0  
Name: PARTICULATES

CAS No: 0NY100-00-0  
Name: HAP

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

CAS No: 0NY998-00-0  
Name: VOC

**Condition 2-12: Malfunctions and start-up/shutdown activities**

**Effective between the dates of 06/14/2013 and 06/07/2016**

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

**Item 2-12.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to



the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

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

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

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

**Condition 2-13: Unavoidable noncompliance and violations**  
**Effective between the dates of 06/14/2013 and 06/07/2016**

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

**Replaces Condition(s) 23**

**Item 2-13.1:**

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

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



representative.

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

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

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

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

**Condition 24: Emission Unit Definition**  
**Effective between the dates of 06/08/2006 and 06/07/2016**

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

**Item 24.1(From Mod 2):**

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

**Item 24.2(From Mod 2):**

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

Emission Unit: G-00000

Emission Unit Description:

Emission Unit G-00000 includes two (2) 300 HP natural gas fired emergency stationary internal combustion engines subject to 40 CFR 63 Subpart ZZZZ.

EP HANB1 vents a 300 HP natural gas fired emergency generator constructed in 1960, 00G03

EP H0179 vents a 300 HP natural gas fired emergency generator constructed in 1960, 00G04

Building(s): BFSBOILR

**Item 24.3(From Mod 2):**

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 btu/hr)

EP H0001 - vents confined NW Round Mill Furnace 1, H11 (6.3 mm btu/hr), located in round mill

EP H0002 - vents confined NE Round Mill Furnace 1, H12 (6.3 mm btu/hr), located in round mill



EP HRMCE - vents two unconfined S Round Mill Furnaces (12.6 mm btu/hr), confined SW Round Mill Furnace 2 (H13, 8 mmbtu/hr), confined SE Round Mill Furnace 2 (H14, 6.3 mmbtu/hr), each located in round mill  
EP HSMCE - vents four unconfined Shape Mill Furnaces (26.86 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 24.4(From Mod 0):**

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 24.5(From Mod 0):**

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

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 24.6(From Mod 0):**

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 CBFSS - 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 24.7(From Mod 0):**

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 (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 24.8(From Mod 0):**

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 24.9(From Mod 0):**

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 H2SO4/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.

Building(s): BFSPICKLE

**Item 24.10(From Mod 0):**

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(From Mod 0):**

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(From Mod 0):**

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.

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Facility DEC ID: 9060300001



Building(s): HAPANNEAL

**Item 24.13(From Mod 0):**

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 2-14: Renewal deadlines for state facility permits**  
**Effective between the dates of 06/14/2013 and 06/07/2016**

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

**Item 2-14.1:**

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Condition 2-15: Compliance Demonstration**  
**Effective between the dates of 06/14/2013 and 06/07/2016**

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

**Item 2-15.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 2-15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 9  
270 Michigan Ave.  
Buffalo, NY 14203

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2014.  
Subsequent reports are due every 12 calendar month(s).

**Condition 2-16: Visible Emissions Limited**  
**Effective between the dates of 06/14/2013 and 06/07/2016**



**Applicable State Requirement:6 NYCRR 211.2**

**Item 2-16.1:**

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

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

**Condition 26: Emission Point Definition By Emission Unit  
 Effective between the dates of 06/08/2006 and 06/07/2016**

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

**Item 26.1(From Mod 2):**

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

**Item 26.2(From Mod 0):**

New York State Department of Environmental Conservation

Permit ID: 9-0603-00001/00042

Facility DEC ID: 9060300001



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  
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFS

Emission Point: A0062

Height (ft.): 40 Diameter (in.): 36  
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  
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: HAP

Emission Point: ABFS1

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

Emission Point: ABFSH

Height (ft.): 39 Diameter (in.): 12  
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFS

**Item 26.3(From Mod 0):**

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

**New York State Department of Environmental Conservation**

Permit ID: 9-0603-00001/00042

Facility DEC ID: 9060300001



**Item 26.4(From Mod 0):**

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

Emission Point: CBFSH

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

**Item 26.5(From Mod 0):**

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 26.6(From Mod 0):**

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 26.7(From Mod 0):**

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

New York State Department of Environmental Conservation

Permit ID: 9-0603-00001/00042

Facility DEC ID: 9060300001



Emission Point: F0181  
Height (ft.): 38 Diameter (in.): 10  
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: WIREMILL

**Item 26.8(From Mod 0):**

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 26.9(From Mod 0):**

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 26.10(From Mod 0):**

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 06/07/2016

Applicable State Requirement:6 NYCRR Subpart 201-5

**Item 27.1(From Mod 2):**

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 27.2(From Mod 2):**

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

**Item 27.3(From Mod 2):**

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 27.4(From Mod 2):**

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:

Process G01 is for the combustion of natural gas in the two (2) 300 HP natural gas fired emergency stationary internal combustion engines, emission sources G03 and G04.

Emission Source/Control: 00G03 - Combustion

Design Capacity: 300 horsepower (electric)

Emission Source/Control: 00G04 - Combustion

Design Capacity: 300 horsepower (electric)

**Item 27.5(From Mod 2):**

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

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: 6.3 million Btu per hour

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Emission Source/Control: 00H12 - Process  
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H13 - Process  
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H14 - Process  
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H15 - Process  
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H16 - Process  
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: H1502 - Process  
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: H1602 - Process  
Design Capacity: 7.96 million Btu per hour

**Item 27.6(From Mod 0):**

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

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

Emission Source/Control: 00A03 - Process

Emission Source/Control: 00A04 - Process

Emission Source/Control: 00A05 - Process

Emission Source/Control: 00A06 - Process

Emission Source/Control: 00A07 - Process

Emission Source/Control: 00A09 - Process

Emission Source/Control: 00A10 - Process

Emission Source/Control: 00A12 - Process

Emission Source/Control: 00A13 - Process

Emission Source/Control: 00A15 - Process

Emission Source/Control: 00A17 - Process

Emission Source/Control: 00A19 - Process

Emission Source/Control: 00A21 - Process

**Item 27.7(From Mod 0):**

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

Emission Unit: B-00000  
Process: B01

Source Classification Code: 3-03-009-12

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Facility DEC ID: 9060300001



Process Description:

This process includes CM grinders, each of which is equipped with a drop box and wet scrubber.

Emission Source/Control: 00B02 - Control  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00B03 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 00B05 - Control  
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00B06 - Control  
Control Type: WET SCRUBBER

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 27.8(From Mod 0):**

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 27.9(From Mod 0):**

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

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 27.10(From Mod 0):**

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 27.11(From Mod 0):**

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

Emission Unit: F-00000  
Process: DYN  
Process Description: Dynamotive Electrolytic Precleaner.

Emission Source/Control: 00DYN - Process

Emission Source/Control: 00F07 - Process

**Item 27.12(From Mod 0):**

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(From Mod 0):**

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

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(From Mod 0):**

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.

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Emission Source/Control: 00J01 - Process

Emission Source/Control: 00J02 - Process

**Item 27.15(From Mod 0):**

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(From Mod 0):**

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 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(From Mod 0):**

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

