

New York State Department of Environmental Conservation
Facility DEC ID: 9062400016



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-0624-00016/02002
Effective Date: 06/13/2007 Expiration Date: 06/12/2012

Permit Issued To: KEYWELL LLC
11900 SOUTH COTTAGE GROVE
CHICAGO, IL 60628

Contact: DENNIS C TROSTLE
VAC AIR DIVISION OF KEYWELL LLC
300 FALCONER RD
FREWSBURG, NY 14738
(716) 569-0739

Facility: VAC AIR DIVISION OF KEYWELL
300 FALCONER RD
FREWSBURG, NY 14738

Description:

Keywell, L.L.C. owns and operates the Vac Air Division located at 300 Falconer Road, Frewsburg, New York. The facility processes stainless steel, high temperature alloys and titanium scrap metal for consumption by industry. The facility's primary processes include: solvent vapor cleaning, thermal degreasing and cleaning, shredding operations, and torching operations.

PROJECT DESCRIPTION:

The current permit action incorporates two permit changes including: (1) changing the existing Air Facility Registration to a Title V permit, and (2) a major permit modification for the installation and operation of a new in-line solvent vapor cleaning machine.

EMISSIONS AND CONTROLS:

The air pollution sources at Keywell emit air pollutants consisting mainly of particulate matter, volatile organic compounds (VOC) and trichloroethylene (TCE). The potential particulate and VOC emissions estimated without the use of air pollution control equipment could exceed 100 tons per year (tpy) and 50 tpy, respectively. The actual TCE emissions exceed the major source threshold of 10 tpy.

Particulate emissions are generated primarily from the shredding, blasting and cutting operations. The facility utilizes cyclones and fabric filters on certain sources to reduce the facility total actual particulate emissions to less than 100 tpy.

VOC emissions (not including the TCE emissions) are produced from the lubricating oils emitted during the shredding and cleaning processes. These VOC emissions are controlled using afterburners on the thermal degreasing unit and the cleaning oven.



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TCE emissions are emitted from the solvent vapor cleaning machines. The solvent vapor cleaning machines control TCE emissions by complying with the National Emission Standards for Halogenated Solvent Cleaning.

APPLICABLE REQUIREMENTS:

6NYCRR Part 201-7 - Federal Enforceable Emission Caps

Keywell has accepted limitations on the VOC emissions to remain a minor source and avoid applicability to the control requirements of 6NYCRR Part 212.10 VOC Reasonably Available Control Technology (RACT). The facility is limiting total VOC emissions below 45 tpy. Keywell is required to maintain monthly VOC emissions estimates of all VOC emitting sources. In addition, the facility maintains and operates afterburners on the thermal degreasing unit and the cleaning oven to reduce the VOC emissions.

6NYCRR Part 212 - General Process Emission Sources:

The particulate emissions generated during the production processes are regulated under 6NYCRR Part 212. These sources are subject to an allowable particulate emission limit of 0.05 grains/dscf and are regulated by a 20 % opacity limit. Compliance with these limits is accomplished through the operation and monitoring of emission control equipment and a weekly visible emission survey of the permitted particulate emission sources.

40 CFR 63 Subpart T - National Emission Standards for Halogenated Solvent Cleaning:

Keywell operates an existing in-line vapor cleaning machine. This existing in-line machine complies with the alternative compliance standard or overall emission limit requirements specified in 40CFR63.464, Subpart T. Keywell is required to maintain emissions from the existing solvent cleaning machine equal to or less than 153 kilograms of TCE per sq. meter per month based on a 3-month average rolled monthly. Continuous compliance with the overall emission limit is associated with the proper operation and maintenance of the carbon adsorption system. In the original permit for the existing machine, the Department required monitoring of the concentration of TCE in the exhaust of the carbon adsorber. This requirement remains in effect and is included on the state side of the permit.

Keywell is proposing to install and operate a new in-line solvent vapor cleaning machine. This new in-line machine is using the idling emission limit as the compliance method, as stated in 40CFR63.463, Subpart T. On-going compliance is met using idling mode covers and routine monitoring of the primary condenser zone temperature as determined during the required idling emission test per Method 307.

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

Keywell operates two exempt small gas boilers with a heat input of 6.3 mmBtu/hr. The sources are not subject to any requirements in Subpart A or DDDDD.

NON-APPLICABLE REQUIREMENTS:

40 CFR 63 Subpart GGGGG - National Emission Standards for Site Remediation:

As per 63.7881(b)(2), the site remediation is exempt since it is performed under a State mandated Order on Consent under the authority of CERCLA as a remedial action.

40 CFR 64 - Compliance Assurance Monitoring:

Particulate emissions generated from the individual cutting, torching and shredding emission units are not



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greater than 100 tpy prior to the emission control equipment. As such, these sources are not subject to Compliance Assurance Monitoring.

6NYCRR Part 212.7(j) - Exemptions:

Solvent metal cleaning processes subject to Part 226 are not subject to the provisions of Part 212 with respect to emissions of volatile organic compounds which are not given an A rating.

6NYCRR Part 226 - Solvent Metal Cleaning Processes:

6NYCRR Part 226 shall not apply to conveyORIZED and open-top vapor degreasers subject to the requirements in 40 CFR 63, Subpart T.

6NYCRR Part 231-2 and 40CFR52.21- New Source Review:

Potential VOC emissions from the new solvent cleaning machine are less than 50 tpy. Thus, the proposed modification is not subject to New Source Review.

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: DOUGLAS E BORSCHER
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ____ / ____ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and Determinations
Applications for permit renewals, 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
HEADQUARTERS
Submission of application for permit modification or renewal-REGION 9
HEADQUARTERS



DEC GENERAL CONDITIONS

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

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:



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

Condition 4: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:

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 4.2:

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 4.3:

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

Item 5.1:

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.

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

Item 6.1:

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;

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- 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 7: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 7.1:

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 14203-2999
(716) 851-7165

Condition 8: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 8.1:

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 14203-2999
(716) 851-7165



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: KEYWELL LLC
11900 SOUTH COTTAGE GROVE
CHICAGO, IL 60628

Facility: VAC AIR DIVISION OF KEYWELL
300 FALCONER RD
FREWSBURG, NY 14738

Authorized Activity By Standard Industrial Classification Code:
5093 - SCRAP AND WASTE MATERIALS

Permit Effective Date: 06/13/2007

Permit Expiration Date: 06/12/2012



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 201-6.5(g): Non Applicable requirements
- 25 6NYCRR 201-7: Facility Permissible Emissions
- *26 6NYCRR 201-7: Capping Monitoring Condition
- 27 6NYCRR 212.4(c): Compliance Certification
- 28 6NYCRR 212.4(c): Compliance Certification
- 29 6NYCRR 212.5(f): Capped sources of VOC and NO_x not subject to 212.9(b) for non A-rated contaminants
- 30 6NYCRR 212.6(a): Compliance Certification
- 31 40CFR 63.7506(c), Subpart DDDDD: Exempt Boilers - Facility

Emission Unit Level

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

EU=U-TCE00

- 34 40CFR 63.460(a), Subpart T: Applicability statement
- 35 40CFR 63.460(b), Subpart T: Part 63 General Provisions requirements



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- 36 40CFR 63.468(h), Subpart T: Compliance Certification
- 37 40CFR 63.468(i), Subpart T: Reduction in submission frequency of exceedance report

EU=U-TCE00,Proc=P03

- 38 40CFR 63.465(e), Subpart T: PTE determination

EU=U-TCE00,Proc=P03,ES=P620A

- 39 40CFR 63.464, Subpart T: Compliance Certification
- 40 40CFR 63.465(b), Subpart T: Compliance Certification
- 41 40CFR 63.465(c), Subpart T: Compliance Certification
- 42 40CFR 63.467(c), Subpart T: Recordkeeping
- 43 40CFR 63.468(g), Subpart T: Compliance Certification

EU=U-TCE00,Proc=P03,ES=P640A

- 44 40CFR 63.463(a), Subpart T: Batch vapor and in-line cleaning machine standards
- 45 40CFR 63.463(c)(2)(ii), Subpart T: Compliance Certification
- 46 40CFR 63.463(d), Subpart T: Compliance Certification
- 47 40CFR 63.463(e)(2)(iv), Subpart T: Compliance Certification
- 48 40CFR 63.465(a), Subpart T: Compliance Certification
- 49 40CFR 63.466(f), Subpart T: Compliance Certification
- 50 40CFR 63.467(a), Subpart T: Compliance Certification
- 51 40CFR 63.467(b), Subpart T: Compliance Certification
- 52 40CFR 63.468(b), Subpart T: Compliance Certification
- 53 40CFR 63.468(d), Subpart T: Initial statement of compliance for new batch vapor and in-line machines
- 54 40CFR 63.468(f), Subpart T: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

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- 55 ECL 19-0301: Contaminant List
- 56 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 57 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

EU=U-TCE00,Proc=P03,ES=C620A

- 58 6NYCRR 212.9(b): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to



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Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

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

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

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

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

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

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

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

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

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order to maintain compliance with the conditions of this permit.

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

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

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

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

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

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

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

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Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

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

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

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

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

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

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

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



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any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees

Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 3.1:

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

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

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

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

Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable



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regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

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

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

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

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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

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

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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following:

i. Compliance certifications shall contain:

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

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

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

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

USEPA Region 2

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

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BQA is as follows:

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

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

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

Condition 8: Recordkeeping requirements



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Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

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

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

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

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

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

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage

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Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

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

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

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 14.1:

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



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Condition 15: Standard Requirement - Provide Information
Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 16.1:

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

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 17.1:

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

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance,



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and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

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

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

Condition 19: Required Emissions Tests
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 211.3



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Item 20.1:

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

Condition 21: Accidental release provisions.

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 68

Item 21.1:

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

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

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

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

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



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Condition 23: Emission Unit Definition

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

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

Emission Unit: U-SHRED

Emission Unit Description:

Emission Unit U-SHRED includes metal shredding operations for high temperature alloys and stainless steel.

Building(s): main

Item 23.2:

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

Emission Unit: U-TCE00

Emission Unit Description:

Emission Unit U-TCE00 includes trichloroethylene (TCE) solvent vapor cleaning operations consisting of two in-line degreasing systems for nickel and titanium parts as follows:

- 1.) A Detrex Model B-50 in-line degreasing unit consisting of a degreaser with 51.96 sq. ft. of solvent/vapor interface area (based on actual solvent/air interface measurement of 7 feet and 2.5 inch square), a solvent vapor recovery system and a dual bed activated carbon control system.
- 2.) A Parts Cleaning Technologies (PCT) Model SED-12-SW degreasing unit consisting of a degreaser with 28.3 sq. ft. of solvent/vapor interface area and a 0.75 freeboard ratio, a solvent vapor recovery system and a dual bed activated carbon control system w/2,150 lbs of carbon per bed.

Building(s): main

Item 23.3:

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

Emission Unit: U-THERM

Emission Unit Description:

Emission Unit U-THERM includes degreasing operations utilizing either a thermal degreaser or a cleaning oven.

Building(s): main



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Item 23.4:

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

Emission Unit: U-TORCH

Emission Unit Description:

Emission Unit U-TORCH includes a titanium torch (source ID P430A) and a nickel torch (source ID P440A) used for cutting scrap metal. The emission points associated with these sources are EP430 and EP440.

Building(s): main

Condition 24: Non Applicable requirements

Effective between the dates of 06/13/2007 and 06/12/2012

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

Item 24.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6NYCRR 212.7(j)

Emission Unit: UTCE00

Reason: Solvent metal cleaning processes subject to Part 226 are not subject to the provisions of Part 212 with respect to emissions of volatile organic compounds which are not given an A rating.

6NYCRR 226.6(a)(3)

Emission Unit: UTCE00

Reason: 6NYCRR Part 226 - Solvent Metal Cleaning Processes - shall not apply to conveyORIZED and open-top vapor degreasers subject to the requirements in 40 CFR 63, Subpart T.

6NYCRR 231-2

Reason: Potential VOC emissions from the new solvent cleaning machine are less than 50 tpy. Thus, the proposed modification is not subject to New Source Review.

40CFR 63-GGGGG

Reason: As per 63.7881(b)(2), the site remediation is exempt since it is performed under a State mandated Order on Consent under the authority of CERCLA as a remedial action.

40CFR 64

Reason: Particulate emissions generated from the cutting, torching and shredding operations are not greater than 100 tpy



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prior to the emission control equipment. As such, these sources are not subject to additional Compliance Assurance Monitoring.

Condition 25: Facility Permissible Emissions
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 201-7

Item 25.1:

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

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

CAS No: 0NY998-00-0

PTE: 90,000 pounds per year

Name: VOC

Condition 26: Capping Monitoring Condition
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 201-7

Item 26.1:

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

6NYCRR 212.10

Item 26.2:

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

Item 26.3:

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

Item 26.4:

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

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levels that would require compliance with an applicable requirement.

Item 26.5:

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

Item 26.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 26.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

- 1.) In accordance with 6NYCRR Part 201-7.2, Keywell shall restrict or cap volatile organic compounds (VOC) emissions from the facility in order to avoid 6NYCRR Part 212 VOC RACT requirements.
- 2.) Facility-wide emissions of total VOC emissions from all emission sources, including exempt and trivial activities, are limited to 45 tons per year (tpy).
- 3.) On-going compliance monitoring of the VOC emission limit shall be documented as follows:
 - a.) Monthly VOC emissions shall be determined and recorded using actual production rates and solvent usage rates, where applicable.
 - b.) Each month, Keywell must compute from the monthly emission records, a rolling 12-month emission rate by summing the previous consecutive 11 month VOC emissions with the current individual monthly VOC emissions.
- 4.) Records shall be maintained to include a log of the 12-month rolling VOC emission estimates and documentation of the emission calculations. The records shall be kept on-site and be made available to the Department upon request.
- 5.) Based on the results of the on-going compliance



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monitoring, if the Department determines there may be an exceedance of the 45 tpy VOC emission limit, then additional investigations may be required.

6.) Any exceedance of the 45 tpy VOC emission limit shall be reported as a deviation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: VOC

Upper Permit Limit: 45 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 27: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 27.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-SHRED Emission Point: EP140

Emission Unit: U-SHRED Emission Point: EP150

Emission Unit: U-THERM Emission Point: EP550

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 27.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

1.) Emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).

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2.) On-going compliance monitoring of the particulate emission limit for Shredder #1, Shredder #2, and the SS Cleaning Oven shall be monitored as described below:

a.) A weekly visible emissions survey of each emission source shall be completed whenever a process is in operation.

b.) Visible emission observations shall be performed, as best as possible, at a location to obtain the proper sun angle, background, and line of sight. The observer must be knowledgeable regarding the effects on the visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor);

c.) Record if visible emissions are observed or not. Condensing water vapor is not considered visible emissions;

d.) If visible emissions are observed, an inspection of the source shall be completed, corrective action taken, and the source restored to its normal operation as expeditiously as practicable.

e.) If the facility is unable to correct the visible emission event, then the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction.

3.) Based on the results of a proposed correction program for the event, if the Department determines there may be an exceedance of the 0.05 grains/dscf emission limit, then completion of an EPA Method 5 compliance test may be required.

4.) Each Method 5 stack test exceeding the 0.05 grains/dscf emissions limit shall be reported as a deviation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PARTICULATES



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Upper Permit Limit: 0.05 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: WEEKLY
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 28: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 28.1:

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

Emission Unit: U-TORCH Emission Point: EP430

Emission Unit: U-TORCH Emission Point: EP440

Emission Unit: U-THERM Emission Point: EP160

Emission Unit: U-SHRED Emission Point: EP170

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

Item 28.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- 1.) Emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).
- 2.) On-going compliance monitoring of the particulate emission limit for the Thermal Degreaser, Titanium Torch, Nickel Torch, and Titanium Cobbler shall be monitored as described below. Please note, each of these sources is equipped with add-on particulate emission control equipment:

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a.) Weekly differential pressure measurements of the baghouses associated with these emission sources shall be completed whenever a process is in normal operation. The purpose of the weekly differential pressure measurements is to detect changes in the long term performance of the control device such as blinding of the fabric of a baghouse collector.

b.) Differential pressure shall be measured between the inlet and outlet to the control device. The differential pressure transducer shall be calibrated annually or as required by the manufacture.

c.) The differential pressure ranges listed below shall be used as indicator ranges.

Source	Pressure (inches of water)
Thermal Degreaser	1.0 - 7.0
Titanium Torch	1.0 - 7.0
Nickel Torch	1.0 - 7.0
Titanium Cobbler	1.0 - 7.0

d.) If any pressure measurement is recorded outside the indicator range, then you shall inspect the source, initiate corrective action, and restore operation of the emission unit (including the control device and associated capture system) to its normal operation as expeditiously as practicable.

e.) If the facility is unable to correct the problem and the pressure measurement remains outside the indicator range, then the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and a schedule for compliance.

3.) Records shall be maintained to include: (1) a log of the weekly pressure drop measurements with reference to the approved differential pressure indicator range, (2) the date and time of the measurement, (3) corrective action taken (if any), and (4) the cause of any pressure measurements outside the indicator range (if known). The records shall be kept on-site and be made available to the Department upon request.



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4.) Based on the results of the on-going compliance monitoring, if the Department determines there may be an exceedance of the 0.05 grains/dscf emission limit, then completion of an EPA Method 5 compliance test may be required.

5.) Each Method 5 stack test exceeding the 0.05 grains/dscf emissions limit shall be reported as a deviation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: WEEKLY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 29: Capped sources of VOC and NO_x not subject to 212.9(b) for non A-rated contaminants
Effective between the dates of 06/13/2007 and 06/12/2012**

Applicable Federal Requirement: 6NYCRR 212.5(f)

Item 29.1:

Owners and/or operators of facilities which have limited the facility's annual potential to emit nitrogen oxides or volatile organic compounds below applicability levels through federally and state enforceable special conditions in permits to construct and/or operate under the provisions of 6 NYCRR Part 212.10(d) must maintain annual actual emissions below these limitations. Nitrogen oxide and volatile organic compound emission points at these facilities are not subject to the control requirements in 6 NYCRR Part 212.9(b) if the emissions are not given an A rating.

**Condition 30: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012**

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 30.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:



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Emission Unit: U-SHRED
Process: P01 Emission Source: P140A

Emission Unit: U-SHRED
Process: P01 Emission Source: P150A

Emission Unit: U-SHRED
Process: P02 Emission Source: P700A

Emission Unit: U-THERM
Process: P05 Emission Source: P550A

Emission Unit: U-TORCH
Process: P06 Emission Source: P430A

Emission Unit: U-TORCH
Process: P06 Emission Source: P440A

Emission Unit: U-THERM
Process: P04 Emission Source: P160A

Emission Unit: U-SHRED
Process: P01 Emission Source: P170A

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

Item 30.2:

Compliance Certification 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.) On-going compliance monitoring of the opacity limit for Shredder #1, Shredder #2, American Pulverizer, Thermal Dryer, SS Cleaning Oven, Titanium Torch, Nickel Torch and Titanium Cobbler shall be monitored as follows:
 - a.) A weekly visible emissions survey of each emission source shall be completed whenever a process is in operation.

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b.) Visible emission observations shall be performed, as best as possible, at a location to obtain the proper sun angle, background, and line of sight. The observer must be knowledgeable regarding the effects on the visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor);

c.) Record if visible emissions are observed or not. Condensing water vapor is not considered visible emissions;

d.) If visible emissions are observed, an inspection of the source shall be completed, corrective action taken, and the source restored to its normal operation as expeditiously as practicable.

e.) If the corrective actions do not eliminate visible emissions, then a Method 9 trained observer shall conduct a minimum six minute opacity observation according to EPA Method 9;

f.) If an exceedance of the 20 percent opacity limit is documented during the Method 9 opacity evaluations, then the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and a schedule for compliance.

3.) Records shall be maintained and include the following information: date, time, staff name, results of the visible emission survey, results of any Method 9 evaluations, results of each inspection, and a description of the corrective action taken. The records shall be kept on-site and be made available to the Department upon request.

4.) Each Method 9 evaluation that demonstrates the 20 percent opacity limit was exceeded, shall be reported as a deviation on the annual compliance certification and the semi-annual monitoring report. The compliance status of this condition shall be reported to the Department semiannually during each calendar year.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent



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Reference Test Method: EPA Method 9
Monitoring Frequency: WEEKLY
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 31: Exempt Boilers - Facility
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.7506(c), Subpart DDDDD

Item 31.1:

The following boilers and process heaters are not subject to the initial notification requirements in §63.9(b) and are not subject to any requirements in subparts A or DDDDD:

- existing small solid fuel units
- existing small liquid fuel units
- existing small gas fuel units
- new or reconstructed small gas fuel units

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

Condition 32: Emission Point Definition By Emission Unit
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 32.1:

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

Emission Unit: U-SHRED		
Emission Point: EP140		
Height (ft.): 22	Length (in.): 20	Width (in.): 40
Emission Point: EP150		
Height (ft.): 22	Length (in.): 20	Width (in.): 40
		Building: main
Emission Point: EP170		
Height (ft.): 18	Length (in.): 42	Width (in.): 42
		Building: main



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Item 32.2:

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

Emission Unit: U-TCE00

Emission Point: EP620

Height (ft.): 28

Diameter (in.): 13

Building: main

Emission Point: EP630

Height (ft.): 21

Diameter (in.): 30

Building: main

Emission Point: EP640

Height (ft.): 28

Diameter (in.): 12

Emission Point: EP650

Height (ft.): 21

Diameter (in.): 36

Building: main

Item 32.3:

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

Emission Unit: U-THERM

Emission Point: EP160

Height (ft.): 25

Diameter (in.): 13

Building: main

Emission Point: EP550

Height (ft.): 30

Diameter (in.): 12

Building: main

Item 32.4:

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

Emission Unit: U-TORCH

Emission Point: EP430

Height (ft.): 15

Length (in.): 15

Width (in.): 12

Building: main

Emission Point: EP440

Height (ft.): 20

Length (in.): 13

Width (in.): 10

Building: main

Condition 33: Process Definition By Emission Unit

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Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 33.1:

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

Emission Unit: U-SHRED

Process: P01

Source Classification Code: 3-05-101-07

Process Description:

Process P01 includes indoor shredding operations -
Shredder #1, Shredder #2, and Titanium Cobbler for Hi-Temp
Alloys. Emissions vent through EP140, EP150 and EP170.

Emission Source/Control: C170A - Control

Control Type: FABRIC FILTER

Emission Source/Control: P140A - Process

Emission Source/Control: P150A - Process

Emission Source/Control: P170A - Process

Item 33.2:

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

Emission Unit: U-SHRED

Process: P02

Source Classification Code: 3-05-103-07

Process Description:

Process P02 includes outdoor shredding operations for
stainless steel. Emissions are fugitive to the outside
atmosphere.

Emission Source/Control: P700A - Process

Item 33.3:

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

Emission Unit: U-TCE00

Process: P03

Source Classification Code: 4-01-002-96

Process Description:

Process P03 includes two solvent vapor in-line continuous
cleaning machines that each use trichlorethylene (TCE) to
remove dirt and oil from metal scrap (i.e., machined
turnings and chips).

The existing Detrex machine is identified as emission

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source P620A. This existing in-line machine complies with the alternative compliance standard or overall emission limit required under 40CFR63.464, Subpart T. Keywell is required to maintain emissions from the Detrex solvent cleaning machine equal to or less than 153 kilograms of TCE per sq. meter per month based on a 3-month average rolled monthly.

Emissions from the Detrex machine vent through emission points EP620 and EP630. The stack TCE emissions are controlled by carbon adsorbers, identified as C620A. Any fugitive TCE emissions are vented primarily through a roof mounted exhaust fan (EP630) in the vapor degreasing area that contains the Detrex machine.

Compliance with the overall emission limit is associated with the proper operation and maintenance of the carbon adsorption system. In the original permit for the Detrex machine, the Department required monitoring of the concentration of TCE in the exhaust of the carbon adsorber. This requirement remains in effect and is included on the state side of the permit.

The new PCT machine is identified as emission source P640A. This new in-line machine is using the idling emission limit as the compliance method, as stated in 40CFR63.463, Subpart T. On-going compliance is met using idling mode covers and routine monitoring of the primary condenser zone temperature as determined during the required idling emission test per Method 307.

Emissions from the new PCT machine vent through emission point EP640 and EP650. The stack emissions are captured for recovery in the solvent vapor recovery system (stills). Still emissions are vented to a carbon adsorption control system using two- 2,150 lb carbon adsorbers, identified as C640A. Any fugitive emissions are vented through a roof mounted exhaust fan (EP650) in the vapor degreasing area that contains the PCT machine.

The PCT machine is equipped with a freeboard refrigeration device (FRD) and the C640A carbon adsorption system. Each of these controls will not be operated during the idling emission test to demonstrate compliance. Provided compliance is demonstrated without the use of these added

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controls, then the monitoring requirements in Subpart T for these systems are not applicable.

Emission Source/Control: C620A - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: C640A - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: P620A - Process

Emission Source/Control: P640A - Process

Item 33.4:

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

Emission Unit: U-THERM

Process: P04

Source Classification Code: 3-04-007-11

Process Description:

Process P04 includes thermal degreasing operation exhaust flows through a series of controls. Dust emissions from the feed conveyor are controlled by a filter and are emitted indoors. Dust and VOC emissions from degreasing are controlled by a series of three devices: a cyclone, an afterburner, and a baghouse and are then emitted through EP160.

Emission Source/Control: C160B - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: C160C - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: C160D - Control
Control Type: FABRIC FILTER

Emission Source/Control: P160A - Process

Item 33.5:

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

Emission Unit: U-THERM

Process: P05

Source Classification Code: 3-04-007-11

Process Description:

Process P05 includes a degreasing operation using an oven. Emissions are controlled by an afterburner before

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being emitted at EP550.

Emission Source/Control: C550A - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: P550A - Process

Item 33.6:

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

Emission Unit: U-TORCH

Process: P06

Source Classification Code: 3-09-030-08

Process Description:

Process P06 includes the cutting of Titanium and Nickel alloy solids using oxygen-mapp gas or oxyacetylene flame.

Emission Source/Control: C430A - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: C430B - Control
Control Type: FABRIC FILTER

Emission Source/Control: C440A - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: C440B - Control
Control Type: FABRIC FILTER

Emission Source/Control: P430A - Process

Emission Source/Control: P440A - Process

Condition 34: Applicability statement

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.460(a), Subpart T

Item 34.1:

This Condition applies to Emission Unit: U-TCE00

Item 34.2:

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test



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method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart.

Condition 35: Part 63 General Provisions requirements
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.460(b), Subpart T

Item 35.1:

This Condition applies to Emission Unit: U-TCE00

Item 35.2:

Owners or operators of affected sources subject to 40CFR63 Subpart T must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Appendix B of Subpart T. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

Condition 36: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.468(h), Subpart T

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch vapor or in-line solvent cleaning machine shall submit an exceedance report to the Administrator semiannually except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under 40CFR 63.468(i) is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in

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paragraphs (1) through (3) of this condition.

(1) Information on the actions taken to comply with §63.463 (e) and (f), if applicable. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

(2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

(3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 37: Reduction in submission frequency of exceedance report
Effective between the dates of 06/13/2007 and 06/12/2012**

Applicable Federal Requirement: 40CFR 63.468(i), Subpart T

Item 37.1:

This Condition applies to Emission Unit: U-TCE00

Item 37.2: An owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in paragraphs (1) through (3) of this condition are met.

(1) The source has demonstrated a full year of compliance without an exceedance.

(2) The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified in 40CFR 63, Subpart A (General Provisions) and in 40CFR 63, Subpart T.

(3) The Administrator does not object to a reduced frequency of reporting for the affected source as provided in 40CFR 63.10(e)(3)(iii).

**Condition 38: PTE determination
Effective between the dates of 06/13/2007 and 06/12/2012**

Applicable Federal Requirement: 40CFR 63.465(e), Subpart T

Item 38.1:

This Condition applies to Emission Unit: U-TCE00

Process: P03

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Item 38.2:

An owner or operator of a source shall determine their potential to emit from all solvent cleaning operations, using the procedures described in paragraphs (1) through (3) of this condition. A facility's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other sources within the facility.

(1) Determine the potential to emit for each individual solvent cleaning using Equation 6.

$$PTE_i = (H_i)(W_i)(SAI_i) \quad (\text{Eq. 6})$$

Where:

PTE_i = the potential to emit for solvent cleaning machine i (kilograms of solvent per year).

H_i = hours of operation for solvent cleaning machine i (hours per year).

= 8760 hours per year, unless otherwise restricted by a Federally enforceable requirement.

W_i = the working mode uncontrolled emission rate (kilograms per square meter per hour).

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

= 1.12 kilograms per square meter per hour for in-line cleaning machines.

SAI_i = solvent/air interface area of solvent cleaning machine i (square meters). 40CFR 63.46 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the procedure in paragraph (2) of this condition.

(2) Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using Equation 7.

$$SAI = (2.20)(Vol)\exp(0.6) \quad (\text{Eq. 7})$$

Where:

SAI = the solvent/air interface area (square meters).

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

(3) Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

Condition 39: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.464, Subpart T

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: P620A

Regulated Contaminant(s):

CAS No: 000079-01-6 TRICHLOROETHYLENE



Item 39.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

(1) As an alternative to meeting the requirements in §63.463, Keywell complies with the requirements of §63.464 for the existing in-line solvent Detrex cleaning machine.

(2) The cleaning machine has a solvent/air interface of 4.83 sq. meters (based on the actual measured value of 51.96 sq.ft.), as defined in §63.461. As such, Keywell is required to:

(i) Maintain a log of solvent additions and deletions for the Detrex solvent cleaning machine.

(ii) Ensure the emissions from the Detrex solvent cleaning machine are equal to or less than 153 kilograms of TCE per sq. meter per month based on a 3-month average rolled monthly.

(3) Keywell shall demonstrate compliance with the applicable 3-month rolling average monthly emission limit on a monthly basis as described in §63.465(b) and (c).

(4) If the applicable 3-month rolling average emission limit is not met, an exceedance has occurred. All exceedances shall be reported as required in §63.468(h).

Parameter Monitored: TRICHLOROETHYLENE

Upper Permit Limit: 153 kilograms per month per square
meter

Reference Test Method: 40CFR63 Subpart T

Monitoring Frequency: MONTHLY

Averaging Method: 3-MONTH AVERAGE ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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



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Condition 40: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.465(b), Subpart T

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: P620A

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with §63.464 shall on the first operating day of every month ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in §63.465(c). The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 41: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.465(c), Subpart T

Item 41.1:

The Compliance Certification activity will be performed for:

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Emission Unit: U-TCE00

Process: P03

Emission Source: P620A

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with §63.464 shall on the first operating day of the month comply with the requirements specified in paragraphs (1) through (3) of this condition.

(1) Using the records of all solvent additions and deletions for the previous monthly reporting period required under §63.464(a), determine solvent emissions (E_i) using Equation 2 for cleaning machines with a solvent/air interface and Equation 3 for cleaning machines without a solvent/air interface:

$$E_i = (SA_i - LSR_i - SSR_i) / AREA_i$$

(Eq. 2)

$$E_n = SA_i - LSR_i - SSR_i$$

(Eq. 3)

where:

E_i = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i , (kilograms of solvent per square meter of solvent/air interface area per month).

E_n = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i , (kilograms of solvent per month).

SA_i = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period i , (kilograms of solvent per month).

LSR_i = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the

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most recent monthly reporting period i , (kilograms of solvent per month).

SSR_i = the total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste, obtained as described in paragraph (2) of this condition, during the most recent monthly reporting period i , (kilograms of solvent per month).

$AREA_i$ = the solvent/air interface area of the solvent cleaning machine (square meters).

(2) Determine SSR_i using either of the following methods.

(i) From tests conducted using EPA reference method 25d.

(ii) By engineering calculations included in the compliance report.

(3) Determine the monthly rolling average, EA , for the 3-month period ending with the most recent reporting period using Equation 4 for cleaning machines with a solvent/air interface or Equation 5 for cleaning machines without a solvent/air interface:

$$EA_i = (\text{Sum of } E_i \text{ from } j=1 \text{ to } j=3) / 3$$

(Eq. 4)

$$EA_n = (\text{Sum of } E_n \text{ from } j=1 \text{ to } j=3) / 3$$

(Eq. 5)

Where:

EA_i = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods, (kilograms of solvent per square meter of solvent/air interface area per month).

EA_n = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods (kilograms of solvent per month).

E_i = halogenated HAP solvent emissions for each month (j) for the most recent 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area).

E_n = halogenated HAP solvent emissions for each month (j) for the most recent 3 monthly reporting periods (kilograms of solvent per month).

$j=1$ = the most recent monthly reporting period.



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j=2 = the monthly reporting period immediately prior to
j=1.
j=3 = the monthly reporting period immediately prior to
j=2.

Averaging Method: 3-MONTH AVERAGE ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 42: Recordkeeping
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.467(c), Subpart T

Item 42.1:

This Condition applies to Emission Unit: U-TCE00
Process: P03 Emission Source: P620A

Item 42.1:

(this space used for Emission Unit)

Item 42.2: Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of §63.464 shall maintain records specified in paragraphs (1) through (3) of this condition either in electronic or written form for a period of 5 years.

- (1) The dates and amounts of solvent that are added to the solvent cleaning machine.
- (2) The solvent composition of wastes removed from cleaning machines as determined using the procedure described in §63.465(c)(2).
- (3) Calculation sheets showing how monthly emissions and the rolling 3-month average emissions from the solvent cleaning machine were determined, and the results of all calculations.

Condition 43: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.468(g), Subpart T

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00
Process: P03 Emission Source: P620A

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



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Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of §63.464 shall submit a solvent emission report every year. This solvent emission report shall contain the requirements specified in paragraphs (1) through (3) of this condition.

(1) The size and type of each unit subject to 40CFR 63, Subpart T (solvent/air interface area or cleaning capacity).

(2) The average monthly solvent consumption for the solvent cleaning machine in kilograms per month.

(3) The 3-month monthly rolling average solvent emission estimates calculated each month using the method as described in §63.465(c).

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 44: Batch vapor and in-line cleaning machine standards
Effective between the dates of 06/13/2007 and 06/12/2012**

Applicable Federal Requirement: 40CFR 63.463(a), Subpart T

Item 44.1:

This Condition applies to Emission Unit: U-TCE00

Process: P03

Emission Source: P640A

Item 44.2:

Except as provided in §63.464 for all cleaning machines, each owner or operator of a solvent cleaning machine subject to the provisions of this subpart shall ensure that each existing or new batch vapor or in-line solvent cleaning machine subject to the provisions of this subpart conforms to the design requirements specified in paragraphs (1) through (7) below.

(1) Each cleaning machine shall be designed or operated to meet the control equipment or technique requirements in paragraph (i) or (ii) below.

(i) An idling and downtime mode cover, as described in §63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes,



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and other defects.

(ii) A reduced room draft as described in §63.463(e)(2)(ii).

(2) Each cleaning machine shall have a freeboard ratio of 0.75 or greater.

(3) Each cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

(4) Each vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils. This requirement does not apply to a vapor cleaning machine that uses steam to heat the solvent.

(5) Each vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

(6) Each vapor cleaning machine shall have a primary condenser.

(7) Each cleaning machine that uses a lip exhaust shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber that meets the requirements of §63.463(e)(2)(vii).

Condition 45: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.463(c)(2)(ii), Subpart T

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00
Process: P03 Emission Source: P640A

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

Item 45.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Each owner or operator of a new in-line cleaning machine shall comply with and demonstrate that their solvent cleaning machine can achieve and maintain an idling

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emission limit of 0.10 kilograms per hour per square meter (0.021 pounds/hour/sq. ft.) of solvent/air interface area as determined using the procedures in Method 307 and appendix A.

Each owner/operator of a solvent cleaning machine complying with the idling emission limit standards shall comply with the following requirements:

- 1) Conduct an initial performance test to demonstrate compliance with the applicable idling emission limit and to establish parameters that will be monitored to demonstrate compliance. If a control device listed in 40CFR63.463(e)(2) is used, then the requirements for that control device shall demonstrate compliance unless the owner/operator can demonstrate an alternative strategy that is equally effective.
- 2) Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in 40CFR63.466(a) through (e) for the respective control device, if applicable.
- 3) Operate the solvent cleaning machine within the parameters identified in the initial performance test.
- 4) If any of the above requirements are not met, determine whether an exceedance has occurred using the following criteria: A) if using a control device listed in 40CFR63.463(e), the owner/operator shall comply with the appropriate parameter values in 463(e)(2) and the exceedance delineations in 40CFR63.463(e)(3)(i) and (ii). B) if using a control not listed in 40CFR63.463(e), owner/operator shall indicate whether the exceedance of the parameters that are monitored to determine the proper functioning of this control would be classified as an immediate exceedance or whether a 15-day repair period would be allowed. This information shall be submitted for approval.
- 5) Owner/operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40CFR63.468(h).

Parameter Monitored: IDLING LIMIT

Upper Permit Limit: 0.1 kilograms per hour per square



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meter (vapor degreasers)

Reference Test Method: 307

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 46: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.463(d), Subpart T

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: P640A

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Work Practices required for all in-line machines complying with either the control combinations or the idling emission limit. (40CFR63.463(d))

1. Air disturbances across the cleaning machine shall be controlled by either using an idling mode cover or reduced room draft.
2. All spraying operations are to be done within the vapor zone.
3. Orient parts so that solvent drains freely from them. Parts with holes shall be tipped or rotated before being removed.
4. Parts or parts baskets are not to be removed until dripping has stopped.
5. During startup of vapor machines, the primary condenser shall be turned on before the sump heater.
6. During shutdown of vapor machines, the sump heater shall be turned off before the primary condenser.

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7. Solvent shall be transferred to and from machines using leakproof couplings and submerged filling.
8. Equipment shall be operated per manufacturer's specifications.
9. Each operator shall be able to pass the applicable sections of the test of solvent cleaning operating procedures in Appendix A of this subpart.
10. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers.
11. Sponges, fabric, wood and paper products are not to be cleaned.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 47: Compliance Certification
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.463(e)(2)(iv), Subpart T

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00
Process: P03 Emission Source: P640A

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

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If an idling-mode cover is used to comply with the requirements of 40CFR63 Subpart T, the owner/operator shall:

- 1) Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers



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the cleaning machine openings when in place, and

2) Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

The owner/operator shall demonstrate compliance with these requirements on a monthly basis by conducting a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 48: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.465(a), Subpart T

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: P640A

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch or in-line solvent cleaning machine complying with an idling emission limit standard shall determine the idling emission rate of the solvent cleaning machine using Reference Method 307 in appendix A of this part.

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 49: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.466(f), Subpart T



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Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: P640A

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the idling emission limit standards shall comply with the requirements as specified in paragraphs (1) and (2) below:

(1) If using controls listed in paragraphs 40 CFR 63.466(a) through (e), the owner or operator shall comply with the monitoring frequency requirements of the complying paragraphs.

(2) If using controls not listed in paragraphs 40 CFR 63.466(a) through (e), the owner or operator shall establish the monitoring frequency for each control and submit it to the Administrator for approval in the initial test report.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 50: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.467(a), Subpart T

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: P640A

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP



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Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of a batch vapor or in-line solvent cleaning machine complying with the provisions in 63.463 shall maintain the following records for the lifetime of the machine:

- 1) Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
- 2) The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the machine and control devices were installed prior to November 29, 1993 will suffice.
- 3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to Subpart T.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 51: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.467(b), Subpart T

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: P640A

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



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Monitoring Description:

The owner/operator of a batch vapor or in-line solvent cleaning machine complying with 63.463 shall maintain the following records for a period of five years.

- 1) The results of control device monitoring required under 63.466
- 2) Information on the actions taken to comply with 63.463(e) and (f) including records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- 3) Estimates of annual solvent consumption for each solvent cleaning machine.
- 4) If a carbon adsorber is used, records of the date and results of the weekly measurement of the halogenated HAP solvent concentration in the carbon adsorber exhaust required in 63.466(e).

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 52: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.468(b), Subpart T

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: P640A

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



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The owner/operator of a new solvent cleaning machine shall submit an initial notification report. New sources shall submit this report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the following information:

- 1) The applicant's name and address.
- 2) A notification of intention to construct a new major affected source or reconstruct an existing major affected source.
- 3) The address of the source.
- 4) The expected commencement date of construction or reconstruction.
- 5) The expected completion date of construction or reconstruction.
- 6) The expected date of initial startup.
- 7) A brief description of each solvent cleaning machine including machine type (batch vapor, in-line, etc.), solvent/air interface area, and existing controls.
- 8) The anticipated compliance approach for each solvent cleaning machine.
- 9) The estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 53: Initial statement of compliance for new batch vapor and in-line machines
Effective between the dates of 06/13/2007 and 06/12/2012**

Applicable Federal Requirement: 40CFR 63.468(d), Subpart T

Item 53.1:

This Condition applies to Emission Unit: U-TCE00
Process: P03 Emission Source: P640A

Item 53.2:

Each owner/operator of a batch vapor or in-line machine complying with 40CFR63.463 shall submit an initial statement of compliance for each solvent cleaning machine no later than 150 days after startup. This statement shall include the following:

- 1) The name and address of the owner/operator.
- 2) The physical location of the solvent cleaning machine(s).
- 3) A list of the control equipment used to achieve compliance for each solvent cleaning machine.



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4) For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.

5) Conditions to maintain the wind speed requirements of 40CFR63.463(e)(2)(ii), if applicable.

6) If the solvent cleaning machine is complying with the idling emission standards, this statement shall include a test report for tests of idling emissions meeting the specifications of Method 307. The report shall comply with the requirements listed in 40CFR63.468(d)(6)(i) through (iv).

Condition 54: Compliance Certification

Effective between the dates of 06/13/2007 and 06/12/2012

Applicable Federal Requirement: 40CFR 63.468(f), Subpart T

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: P640A

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of a batch vapor or in-line solvent cleaning machine complying with 63.463 shall submit an annual report by February 1 of the year following the one for which the reporting is being made. The report shall include the following:

1) A signed statement from the facility owner or the designee stating that "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 63.463(d)(10)"

2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

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STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

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

Condition 55: Contaminant List
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable State Requirement: ECL 19-0301

Item 55.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this



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permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 000079-01-6

Name: TRICHLOROETHYLENE

CAS No: 0NY998-00-0

Name: VOC

Condition 56: Unavoidable noncompliance and violations
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable State Requirement: 6NYCRR 201-1.4

Item 56.1:

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.



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(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 57: Air pollution prohibited
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable State Requirement: 6NYCRR 211.2

Item 57.1:

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

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

Condition 58: Compliance Demonstration
Effective between the dates of 06/13/2007 and 06/12/2012

Applicable State Requirement: 6NYCRR 212.9(b)

Item 58.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TCE00

Process: P03

Emission Source: C620A

Regulated Contaminant(s):

CAS No: 000079-01-6 TRICHLOROETHYLENE

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Item 58.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- 1.) Keywell shall measure and record the concentration of TCE in the exhaust of the carbon adsorber for the Detrex machine. The measurement shall be taken weekly with a colorimetric detector tube or photoionization detector (PID). This test shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber.
- 2.) The measurement device shall be calibrated as required by the manufacture and the measurement corrected for TCE.
- 3.) If the TCE exhaust concentration is greater than 25 parts per million (ppm), then you shall inspect the source, initiate corrective action, and restore operation of the emission unit (including the control device and associated capture system) to its normal operation as expeditiously as practicable.
- 4.) If the facility is unable to correct the problem and the exhaust concentration remains above 25 ppm TCE, then the facility shall report the results to the Department within 30 calendar days along with a proposed program for correction and a schedule for compliance.
- 5.) Records shall be maintained to include: (1) a log of the weekly TCE concentrations, (2) the date and time of the measurement, (3) corrective action taken (if any), and (4) the cause of any measurements greater than 25 ppm TCE (if known). The records shall be kept on-site and be made available to the Department upon request.

Monitoring Frequency: WEEKLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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