



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-0624-00016/02002
Effective Date: 10/23/2013 Expiration Date: 10/22/2018

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

Contact: R BRADLEY ALBRIGHT
KEYWELL LLC
300 FALCONER RD
FREWSBURG, NY 14738
(716) 569-0700

Facility: KEYWELL LLC
300 FALCONER STREET
FREWSBURG, NY 14738

Description:

Keywell, L.L.C. owns and operates the facility located at 300 Falconer Road, Frewsburg, New York. The facility processes and cleans stainless steel, high temperature alloys and titanium scrap metal for reuse by industry. The air pollution sources at Keywell emit mainly particulate matter, volatile organic compounds (VOC) and hazardous air pollutants (HAP).

The current permit action is the first Title V renewal permit and includes the following changes:

- (1) Addition of a limit on HAP emissions below 10 tpy for individual HAPs and below 25 tpy for total HAPs. This limit ensures the two 6.3 mmBtu/hr gas-fired boilers are not subject to 40CFR63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, final rule February 1, 2013. The facility remains subject to the Halogenated Solvent Cleaning NESHAP 40CFR63 Subpart T;
- (2) Addition of the cold batch vapor degreaser subject to the applicable requirements of 6NYCRR Part 226;
- (3) Revision of the carbon adsorber indicator measurement to match the criteria specified in 40 CFR 63 Subpart T; and
- (4) Removal of the titanium torching and blasting operations that have been relocated to Falconer, NY and are permitted under registration ID 9-0638-00219/00001.



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 BORSCHEL
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- 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: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-0624-00016/02002

Facility DEC ID: 9062400016



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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

Facility: KEYWELL LLC
300 FALCONER STREET
FREWSBURG, NY 14738

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

Permit Effective Date: 10/23/2013

Permit Expiration Date: 10/22/2018



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
 - 2 6 NYCRR 201-6.4 (a) (7): Fees
 - 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance
Monitoring
 - 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and
Measurement
 - 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
 - 6 6 NYCRR 201-6.4 (e): Compliance Certification
 - 7 6 NYCRR 202-2.1: Compliance Certification
 - 8 6 NYCRR 202-2.5: Recordkeeping requirements
 - 9 6 NYCRR 215.2: Open Fires - Prohibitions
 - 10 6 NYCRR 200.7: Maintenance of Equipment
 - 11 6 NYCRR 201-1.7: Recycling and Salvage
 - 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected
Contaminants to the air
 - 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
 - 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
 - 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
 - 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
 - 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
 - 18 6 NYCRR 202-1.1: Required Emissions Tests
 - 19 40 CFR Part 68: Accidental release provisions.
 - 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
 - 21 6 NYCRR Subpart 201-6: Emission Unit Definition
 - 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
 - 23 6 NYCRR 201-6.4 (g): Non Applicable requirements
 - 24 6 NYCRR Subpart 201-7: Facility Permissible Emissions
 - *25 6 NYCRR Subpart 201-7: Capping Monitoring Condition
 - *26 6 NYCRR Subpart 201-7: Capping Monitoring Condition
 - 27 6 NYCRR 211.1: Air pollution prohibited
 - 28 6 NYCRR 212.4 (c): Compliance Certification
 - 29 6 NYCRR 212.4 (c): Compliance Certification
 - 30 6 NYCRR 212.6 (a): Compliance Certification
- #### Emission Unit Level
- 31 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
 - 32 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=U-NPB00

- 33 6 NYCRR Part 212: Compliance Certification
- 34 6 NYCRR Part 226: Compliance Certification

EU=U-TCE00

- 35 40CFR 63.460(a), Subpart T: Applicability statement
- 36 40CFR 63.460(b), Subpart T: Part 63 General Provisions requirements
- 37 40CFR 63.464, Subpart T: Compliance Certification
- 38 40CFR 63.465(b), Subpart T: Compliance Certification



- 39 40CFR 63.465(c), Subpart T: Compliance Certification
- 40 40CFR 63.465(e), Subpart T: Compliance Certification
- 41 40CFR 63.467(c), Subpart T: Recordkeeping
- 42 40CFR 63.468(g), Subpart T: Compliance Certification
- 43 40CFR 63.468(h), Subpart T: Compliance Certification
- 44 40CFR 63.468(i), Subpart T: Reduction in submission frequency of
exceedance report
- 45 40CFR 63.471(b)(1), Subpart T: Compliance Certification
- 46 40CFR 63.471(b)(2), Subpart T: Compliance Certification
- 47 40CFR 63.471(c), Subpart T: Compliance Certification
- 48 40CFR 63.471(e), Subpart T: Compliance Certification
- 49 40CFR 63.471(h), Subpart T: Compliance Certification

EU=U-THERM

- 50 6 NYCRR 212.10 (c) (4) (i): Compliance Certification

EU=U-VOC00

- 51 6 NYCRR Part 226: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 52 ECL 19-0301: Contaminant List
- 53 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

Emission Unit Level

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

- 54 6 NYCRR 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 - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;

(3) During the period of the emergency the facility owner 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 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 or operator seeking to establish the occurrence of an emergency has the burden of proof.

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

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

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



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)

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

Item D: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)

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

Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)

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

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)

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

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)

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

Item H: Property Rights - 6 NYCRR 201-6.4 (a) (6)

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



Item I: Severability - 6 NYCRR 201-6.4 (a) (9)

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

Item J: Permit Shield - 6 NYCRR 201-6.4 (g)

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

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

Item K: Reopening for Cause - 6 NYCRR 201-6.4 (i)

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

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



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

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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



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

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

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

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

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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

Condition 2: Fees
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

Item 2.1:

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

Condition 3: Recordkeeping and Reporting of Compliance Monitoring
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 201-6.4 (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 201-6.2 of Part 201.

**Condition 4: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 10/23/2013 and 10/22/2018**

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**Condition 5: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018**

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



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

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

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill



Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

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

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

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



Condition 6: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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Facility DEC ID: 9062400016



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

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

NYSDEC Region 9 Headquarters
270 Michigan Avenue
Buffalo, NY 14203-2915

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 1/30/2014.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

New York State Department of Environmental Conservation

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Albany NY 12233-3251

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

Condition 8: Recordkeeping requirements
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

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

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

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

Condition 9: Open Fires - Prohibitions
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

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

Item 9.2

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

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



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

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

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

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

**Condition 10: Maintenance of Equipment
Effective between the dates of 10/23/2013 and 10/22/2018**

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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

**Condition 11: Recycling and Salvage
Effective between the dates of 10/23/2013 and 10/22/2018**

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, the owner or operator of 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 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 10/23/2013 and 10/22/2018

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

Item 13.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 10/23/2013 and 10/22/2018

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

Item 14.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 15: Requirement to Provide Information

Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 201-6.4 (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: Right to Inspect



Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 201-6.4 (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: Off Permit Changes

Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)

Item 17.1:

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 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 18: Required Emissions Tests

Effective between the dates of 10/23/2013 and 10/22/2018



Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1:

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

Emission Unit: U-NPB00

Emission Unit Description:

Emission Unit U-NPB00 includes an n-propyl bromide (n-PB) solvent vapor cleaning operation consisting of an in-line degreasing system for nickel-based scrap metal chips as follows:

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 triple bed activated carbon control system w/2,150 lbs of carbon per bed. Ammonium hydroxide is used during the activated carbon adsorber regeneration process to prevent bromic acid formation.

Building(s): main

Item 21.2:

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 21.3:

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

Emission Unit: U-TCE00

Emission Unit Description:

Emission Unit U-TCE00 includes a trichloroethylene (TCE) solvent vapor cleaning operation consisting of an in-line degreasing system for nickel and titanium parts as follows:

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.

Building(s): main

Item 21.4:

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

Emission Unit: U-THERM

New York State Department of Environmental Conservation

Permit ID: 9-0624-00016/02002

Facility DEC ID: 9062400016



Emission Unit Description:

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

Building(s): main

Item 21.5:

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 nickel torch (source ID P440A) used for cutting scrap metal. The emission point associated with this source is EP440.

Building(s): main

Item 21.6:

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

Emission Unit: U-VOC00

Emission Unit Description:

Emission Unit U-VOC00 includes a petroleum distillate parts cleaner that is exempt from permitting under 6NYCRR Part 201-3. However, this source is subject to the solvent metal cleaning regulation in 6NYCRR Part 226. As such, this source and the applicable requirements are included in the permit.

Condition 22: Progress Reports Due Semiannually

Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)

Item 22.1:

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

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

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

Condition 23: Non Applicable requirements

Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 201-6.4 (g)

Item 23.1:

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.

6 NYCRR 226.6 (a) (3)

Emission Unit: UTCE00

Reason: 6NYCRR Part 226 - Solvent Metal Cleaning Processes - does not apply to Emission Unit U-TCE00, a conveyORIZED degreaser that is subject to the requirements in 40 CFR 63, Subpart T.

40 CFR Part 63, Subpart DDDDD

Reason: (1) Keywell is limiting total HAP emissions below 10/25 tons per year. Thus, the two 6.3 mmBtu/hr gas-fired boilers are not subject to 40CFR63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants (NESHAP/MACT) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, final rule February 1, 2013.

(2) As per the May 16, 1995 Memorandum from John S. Seitz, EPA Director of Office of Air Quality Planning and Standards (MD-10):

“A facility that is subject to a prior MACT standard is not necessarily a major source for future MACT standards. For example, if after compliance with a MACT standard, a source's potential to emit is less than the 10/25 tons per year applicability level, the EPA will consider the facility an area source for purposes of a subsequent standard.”

(3) Keywell is in compliance with a prior MACT for Halogenated Solvent Cleaning, effective December 1994. The potential HAP emissions after the MACT controls are less than 10/25 tpy. As such, the facility is considered an area source and not subject to the recently adopted major source Boiler MACT 40CFR63 Subpart DDDDD.

40 CFR Part 63, Subpart GGGGG

Reason: As per 63.7881(b)(2), the site remediation is not subject to 40CFR 63 Subpart GGGGG, National Emission Standards for Hazardous Air Pollutants: Site Remediation, since it is performed under a State mandated Order on Consent under the authority of CERCLA as a remedial action.

40 CFR Part 63, Subpart JJJJJ

Reason: (1) Keywell operates two 6.3 mmBtu/hr gas-fired boilers which are not subject to 40CFR63 Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources based on the following:

New York State Department of Environmental Conservation

Permit ID: 9-0624-00016/02002

Facility DEC ID: 9062400016



Regulated Contaminant(s):

CAS No: 000079-01-6 TRICHLOROETHYLENE

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) Keywell is limiting individual hazardous air pollutant (HAP) emissions to less than 10 tons per year (tpy). Trichloroethylene (TCE) is the largest individual HAP emitted from the solvent cleaning operation.

(2) By limiting the TCE emissions, the two 6.3 mmBtu/hr gas-fired boilers are not subject to 40CFR63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

(3) Keywell shall document total rolling 12-month TCE emissions from the solvent cleaning operation using the procedures in 40CFR 63.471(c).

Parameter Monitored: TRICHLOROETHYLENE

Upper Permit Limit: 10 tons per year

Monitoring Frequency: MONTHLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 27: Air pollution prohibited
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR 211.1

Item 27.1:

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

Condition 28: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018



Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 28.1:

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

Emission Unit: U-SHRED	Emission Point: EP170
Emission Unit: U-THERM	Emission Point: EP160
Emission Unit: U-TORCH	Emission Point: EP440
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, 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:

(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) 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.



- (d) 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.
- (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: Arithmetic average of stack test runs
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 29.1:

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 29.2:

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 (gr/dscf).

(2) On-going compliance monitoring of the particulate emission limit for Shredder #1, Shredder #2, and the SS Cleaning Oven shall be assessed based on observations, such as, the production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. Keywell shall confirm all pertinent parameters are within ranges that ensure the sources are in compliance with the particulate emission rate.

(3) Keywell shall immediately investigate any instance where there is cause to believe particulate emissions are above 0.05 gr/dscf. These instances include, but are not limited to, process upsets, control device malfunctions, abnormal visible emissions, complaints, etc. During these instances, Keywell shall determine the cause, make the necessary correction, and verify the excess emission problem has been corrected.

(4) Records of these observations, investigations and corrective actions shall be kept on-site and summarized in the semiannual progress report and annual compliance certifications.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.05 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: Arithmetic average of stack test runs
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 30: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018



Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 30.1:

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

Emission Unit: U-SHRED Process: P01	Emission Source: P140A
Emission Unit: U-SHRED Process: P01	Emission Source: P150A
Emission Unit: U-SHRED Process: P01	Emission Source: P170A
Emission Unit: U-SHRED Process: P02	Emission Source: P700A
Emission Unit: U-THERM Process: P04	Emission Source: P160A
Emission Unit: U-THERM Process: P05	Emission Source: P550A
Emission Unit: U-TORCH Process: P06	Emission Source: P440A
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, 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.
 - (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

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 1/30/2014.
Subsequent reports are due every 6 calendar month(s).

**** Emission Unit Level ****

Condition 31: Emission Point Definition By Emission Unit
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 31.1:

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

Emission Unit: U-NPB00

Emission Point: EP640
Height (ft.): 28 Diameter (in.): 12
NYTMN (km.): 4665.735 NYTME (km.): 156.06

Emission Point: EP650
Height (ft.): 21 Diameter (in.): 36
NYTMN (km.): 4665.735 NYTME (km.): 156.06 Building: main

Item 31.2:

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
NYTMN (km.): 4665.735 NYTME (km.): 156.06

Emission Point: EP150
Height (ft.): 22 Length (in.): 20 Width (in.): 40
NYTMN (km.): 4665.735 NYTME (km.): 156.06 Building: main

Emission Point: EP170
Height (ft.): 18 Length (in.): 42 Width (in.): 42
NYTMN (km.): 4665.735 NYTME (km.): 156.06 Building: main

Item 31.3:

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
NYTMN (km.): 4665.735 NYTME (km.): 156.06 Building: main



Emission Point: EP630
Height (ft.): 21 Diameter (in.): 30
NYTMN (km.): 4665.735 NYTME (km.): 156.06 Building: main

Item 31.4:

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
NYTMN (km.): 4665.735 NYTME (km.): 156.06 Building: main

Emission Point: EP550
Height (ft.): 30 Diameter (in.): 12
NYTMN (km.): 4665.735 NYTME (km.): 156.06 Building: main

Item 31.5:

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

Emission Unit: U-TORCH

Emission Point: EP440
Height (ft.): 20 Length (in.): 13 Width (in.): 10
NYTMN (km.): 4665.735 NYTME (km.): 156.06 Building: main

**Condition 32: Process Definition By Emission Unit
Effective between the dates of 10/23/2013 and 10/22/2018**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 32.1:

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

Emission Unit: U-NPB00
Process: P08 Source Classification Code: 4-01-002-96

Process Description:

Process P08 includes a solvent vapor in-line continuous cleaning machine that uses n-propyl bromide (n-PB) to remove dirt and oil from metal scrap (i.e., machined turnings and chips).

The PCT machine is identified as emission source P640A. The PCT machine was initially permitted for TCE and demonstrated compliance with the T-MACT idling emission limits. The PCT machine currently utilizes n-PB as the cleaning solvent. The n-PB emissions generated from the PCT solvent cleaning machine are regulated by 6NYCRR Part 226. The PCT machine has demonstrated compliance with the equipment specifications, operating requirements and general requirements of Part 226.

New York State Department of Environmental Conservation

Permit ID: 9-0624-00016/02002

Facility DEC ID: 9062400016



Emissions from the 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 three- 2,150 lb carbon adsorbers, identified as C640A. The PCT machine is equipped with a freeboard refrigeration device (FRD) and the C640A carbon adsorption system. Any fugitive emissions are vented through a roof mounted exhaust fan (EP650) in the vapor degreasing area that contains the PCT machine.

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

Emission Source/Control: P640A - Process

Item 32.2:

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 32.3:

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 32.4:

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 a solvent vapor in-line continuous cleaning machine that uses trichlorethylene (TCE) to remove dirt and oil from metal scrap (i.e., machined turnings and chips).

The existing Detrex machine is identified as emission 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.

As required by Subpart T, by May 3, 2010, the total emissions of trichloroethylene (TCE) used in all solvent cleaning machines including the Detrex machine must be equal to or less than 14,100 kilograms or 31,161 pounds based on a 12-month rolling total emission limit.

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

Emission Source/Control: P620A - Process

Item 32.5:

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 a thermal degreasing operation where the 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



Process P09 includes a petroleum distillate parts cleaner that is exempt from permitting under 6NYCRR Part 201-3. However, this source is subject to the solvent metal cleaning regulation in 6NYCRR Part 226. As such, this source and the applicable requirements are included in the permit.

Emission Source/Control: PARTS - Process

Condition 33: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement: 6 NYCRR Part 212

Item 33.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-NPB00

Regulated Contaminant(s):

CAS No: 000106-94-5 PROPANE, 1-BROMO-

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(1) Based on Part 212 and the results of the DAR-1 analysis, Keywell is required to use Best Achievable Control Technology (BACT) on the PCT solvent cleaning process to maximize emission capture and control of fugitive emissions as follows:

Freeboard Refrigeration Device;
Freeboard Ratio greater than 0.75;
Liquid and vapor level indicators;
Primary condenser;
Automated parts handling;
Idling mode procedures;
Carbon Adsorber;
Collection hoods located around the parts inlet and outlet openings;
Enclosures around the centrifuge, strainer and shaker; and
Standard operating procedures to minimize air disturbances and solvent losses during maintenance activities, solvent addition procedures and waste transfer operations.

(2) On-going monitoring of the proper operation of the carbon adsorber shall be conducted as described below:



(a) Three activated carbon beds are used to control the n-PB emissions from the PCT solvent vapor cleaning machine. The beds are operated in series using a rotating pattern where two beds are operated in primary and secondary status while the third bed operates in standby mode. The beds are then rotated based on a predetermined time period to switch the secondary vessel to the primary position and change the standby vessel to the secondary position to prevent breakthrough from occurring. The primary bed is then regenerated and placed in standby mode.

(b) The bed rotation time period is determined based on manufacturer recommendations and previously measured photoionization detector (PID) data obtained from inlet and outlet nPB concentrations to prevent breakthrough. The bed rotation time period at the time of this permit action was approximately two (2) hours.

(c) Keywell shall complete monthly inlet and outlet PID measurements across each bed while in primary status to verify the percent reduction efficiency across the first bed of the rotation. In addition, the outlet of the secondary bed shall be measured.

(d) The inlet and outlet concentrations shall be measured during the last 10 minutes of the bed rotation time period. The PID measurements shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorption system. The PID measurements can be completed on different days as long as each bed is measured one time during the monitoring period.

(e) The measurement device shall be calibrated as required by the manufacturer.

(f) If the percent reduction of nPB in the first carbon bed is less than 50 percent, then Keywell 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.

(g) If the facility is unable to correct the problem and the percent reduction remains below 50 percent, 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.

(h) Records shall be maintained to include: (1) a log of the monthly nPB concentrations and percent

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reduction efficiency, (2) the date and time of the measurement, (3) corrective action taken (if any), and (4) the cause (if known). The records shall be kept on-site and be made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 34: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:6 NYCRR Part 226

Item 34.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-NPB00

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The n-PB emissions generated from the PCT solvent cleaning machine are regulated by the RACT requirements of 6NYCRR Part 226 including general requirements, equipment specifications, and operating requirements to minimize solvent loss. Part 226 identifies three general categories of solvent cleaning operations. The unique design and application of the PCT machine most closely matches the category of "conveyorized degreasing". The approved methods by which the PCT degreasing operation complies with the general requirements of 226.2, the equipment specifications of 226.3(c) and the operating requirements of 226.4(c) are detailed in the August 24, 2009 application for modification of the existing Title V permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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



Condition 35: Applicability statement
Effective between the dates of 10/23/2013 and 10/22/2018

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

Item 35.1:
This Condition applies to Emission Unit: U-TCE00

Item 35.2:
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 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 36: Part 63 General Provisions requirements
Effective between the dates of 10/23/2013 and 10/22/2018

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

Item 36.1:
This Condition applies to Emission Unit: U-TCE00

Item 36.2:
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 37: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:40CFR 63.464, Subpart T

Item 37.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Regulated Contaminant(s):
CAS No: 000079-01-6 TRICHLOROETHYLENE

Item 37.2:
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.

(iii) Based on this alternate compliance method, the maximum amount of TCE emitted by the Detrex machine can be approximated as follows: $153 \text{ kg/sq.meter/month} \times 4.83 \text{ sq.meters} = 739 \text{ kg/month}$ or 1633 lbs/month which equates to about 19,598 lbs/year or 9.8 tons/year TCE from the Detrex cleaning machine.

(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 1/30/2014.

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

Condition 38: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018



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

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

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

Item 38.2:

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 1/30/2014.

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

Condition 39: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

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

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

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

Item 39.2:

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 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.

$j=2$ = 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 1/30/2014.

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

Condition 40: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

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

Item 40.1:

The Compliance Certification activity will be performed for:

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Permit ID: 9-0624-00016/02002

Facility DEC ID: 9062400016



Emission Unit: U-TCE00

Regulated Contaminant(s):

CAS No: 000079-01-6 TRICHLOROETHYLENE

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keywell has one solvent vapor cleaning machine at the facility that uses a solvent subject to 40 CFR 63 Subpart T. The calculated Potential to Emit (PTE) for the affected machine using Equation 6 of 40CFR 63.465(e), Subpart T, is as follows:

$$PTE_i = (H_i)(W_i)(SA_i)$$

Detrex Model RV-909-11, Size B-50:

$$\begin{aligned} PTE &= (8760 \text{ hrs/yr}) (1.95 \text{ kg/sq.meter/hour}) (4.83 \\ &\text{sq.meters}) \\ &= 82,506 \text{ kg/yr} \\ &= 91 \text{ tons per year solvent} \end{aligned}$$

The PTE value represents the working mode uncontrolled emission rate from the solvent vapor cleaning machine. The facility is limiting solvent emissions by maintaining the equipment controls, complying with the alternative standard and monitoring actual monthly emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 41: Recordkeeping

Effective between the dates of 10/23/2013 and 10/22/2018

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

Item 41.1:

This Condition applies to Emission Unit: U-TCE00

Item 41.1:

(this space used for Emission Unit)

Item 41.2: 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.

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- (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 42: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

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

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 42.2:

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 1/30/2014.

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

Condition 43: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018



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

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

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 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 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 1/30/2014.

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

**Condition 44: Reduction in submission frequency of exceedance report
Effective between the dates of 10/23/2013 and 10/22/2018**

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

Item 44.1:

New York State Department of Environmental Conservation

Permit ID: 9-0624-00016/02002

Facility DEC ID: 9062400016



This Condition applies to Emission Unit: U-TCE00

Item 44.2: 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 45: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:40CFR 63.471(b)(1), Subpart T

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must maintain a log of solvent additions and deletions for each solvent cleaning machine.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 46: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:40CFR 63.471(b)(2), Subpart T

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Regulated Contaminant(s):

CAS No: 000079-01-6 TRICHLOROETHYLENE



Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(1) As per 40CFR 63.471(b)(2), Keywell must ensure the total emissions of trichloroethylene (TCE) used in all solvent cleaning machines are equal to or less than 14,100 kilograms or 31,161 pounds based on a 12-month rolling total emission limit as determined using the procedures in 40CFR 63.471(c).

(2) As required in Condition 26 of this permit renewal, Keywell has a more stringent facility-wide emission limit of 20,000 pounds per year of TCE. As such, the above higher allowable TCE emission rate of 31,161 pounds is not applicable.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 47: Compliance Certification

Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:40CFR 63.471(c), Subpart T

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall on the first operating day of every month, demonstrate compliance with the applicable facility-wide emission limit on a 12-month rolling total basis using the procedures in paragraphs 40CFR 63.471(c)(1) through (5). For purposes of this paragraph, EACH SOLVENT CLEANING MACHINE means each solvent cleaning machine that is part of an affected facility regulated by this section.

(1) The owner or operator shall, on the first operating day of every month, ensure that each 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 soiled materials. 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 paragraphs (2) and (3). The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

(2) The owner or operator shall, on the first operating day of the month, using the records of all solvent additions and deletions for the previous month, determine solvent emissions (Eunit) from each solvent cleaning machine using equation 10 in 40CFR 63.471

(3) The owner or operator shall, on the first operating day of the month, determine SSRI using the method specified in paragraph (i) or (ii).

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

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

(4) The owner or operator shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, ETunit, for the 12-month period ending with the most recent month using equation 11 in 40CFR 63.471

(5) The owner or operator shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, ETfacility, for the 12-month period ending with the most recent month using equation 12 in 40CFR 63.471

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 48: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement: 40CFR 63.471(e), Subpart T

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Facility DEC ID: 9062400016



Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall maintain records specified in paragraphs (1) through (3) either in electronic or written form for a period of 5 years. For purposes of this paragraph, EACH SOLVENT CLEANING MACHINE means each solvent cleaning machine that is part of an affected facility regulated by this section.

(1) The dates and amounts of solvent that are added to each solvent cleaning machine.

(2) The solvent composition of wastes removed from each solvent cleaning machines as determined using the procedure described in paragraph (3).

(3) Calculation sheets showing how monthly emissions and the 12-month rolling total emissions from each solvent cleaning machine were determined, and the results of all calculations.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 49: Compliance Certification

Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement:40CFR 63.471(h), Subpart T

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TCE00

Regulated Contaminant(s):

CAS No: 000079-01-6 TRICHLOROETHYLENE

Item 49.2:

Compliance Certification shall include the following monitoring:

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Facility DEC ID: 9062400016



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility shall submit a solvent emission report every year. This solvent emission report shall contain the requirements specified in paragraphs (h)(1) through (h)(3) of this section.

(1) The average monthly solvent consumption for the affected facility in kilograms per month.

(2) The 12-month rolling total solvent emission estimates calculated each month using the method as described in paragraph (c) of this section.

(3) This report can be combined with the annual report required in § 63.468(f) and (g) into a single report for each facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 50: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

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

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-THERM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 50.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

(1) In accordance with 6NYCRR Part 212.10(c)(4)(i), volatile organic compound (VOC) emission points equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent are equipped with reasonably available control technology (RACT).



(2) Keywell operates a Thermal Degreaser (EP 160) and an SS Cleaning Oven (EP 550) with a capture system and control device having an overall removal efficiency greater than 81 percent. Potential VOC emissions after controls from these sources are 0.073 lbs/hr and 0.01 lbs/hr, respectively.

(3) On-going compliance monitoring of the required thermal oxidizer used to control emissions from the Thermal Degreaser and SS Cleaning Oven shall be completed as described below:

(a) Keywell is required to operate the control devices on each source at all times the sources are in operation.

(b) The temperature of the thermal oxidizer exhaust shall be measured by an in stack continuous temperature monitoring device.

(c) The temperature of the Thermal Degreaser oxidizer exhaust operates at 1400 degrees Fahrenheit or greater. If the oxidizer temperature drops below 1400 degrees Fahrenheit, electronic controls automatically shutdown the product feed conveyor and cause a panel indicator light to signal an oxidizer low temperature condition.

(d) The SS Cleaning Oven oxidizer exhaust operates at 1400 degrees Fahrenheit or greater. If the oxidizer fails to ignite, an integral fail-safe relay shuts off the oven burner and automatically signals an equipment failure.

(e) Any event when the temperature drops below 1400 degrees Fahrenheit shall be corrected as follows: 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.

(f) If the facility is unable to correct the problem and the oxidizer temperature cannot be maintained at 1400 degrees Fahrenheit, 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.

(4) Records shall be maintained to include: (1) a record of any events where the temperature was below 1400 degrees Fahrenheit with an explanation of the cause, (2) inspection results (if any), and (3) corrective action



taken (if any). The records shall be kept on site and be made available to the Department upon request.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1400 degrees Fahrenheit
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable Federal Requirement: 6 NYCRR Part 226

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-VOC00

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

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The petroleum distillate parts cleaner identified as emission source, PARTS, is subject to the cold cleaning degreasing sections of 6 NYCRR Part 226 as follows:

§226.2 GENERAL REQUIREMENTS

A person conducting solvent metal cleaning must:

- (a) store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere;
- (b) maintain equipment to minimize leaks and fugitive emissions;
- (c) display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs;
- (d) keep the degreaser cover closed except when parts are being placed into or being removed from the degreaser, the cover needs to be open in order to add or remove solvent



- from the degreaser, no solvent is in the degreaser, or manually cleaning metal parts in a cold cleaning degreaser;
- (e) create and retain a record of solvent consumption for five years. This record must be made available to the department upon request;
 - (f) not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser; and
 - (g) if using a cold cleaning degreaser that is subject to section 226.3(a)(4) of this Part, retain a record of the following three items for five years and provide these records to the department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a material safety data sheet (MSDS), or other appropriate documentation acceptable to the department may be used to comply with this requirement:
 - (1) the name and address of the solvent supplier;
 - (2) the type of solvent including the product or vendor identification number; and
 - (3) the vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

§226.3 EQUIPMENT SPECIFICATIONS

Except as otherwise permitted by the department pursuant to section 226.5 of this Part, the following types of control equipment must be used by a person conducting solvent metal cleaning:

- (a) Cold cleaning degreasing when the internal volume of the machine is greater than two gallons.
 - (1) A cover which can be operated easily.
 - (2) An internal drainage facility (under cover), if practical.
 - (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. Remote reservoir degreasers are exempt from this requirement.
 - (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20°C. The solvent used by Keywell has a vapor pressure of 0.2 mm Hg at 20°C.

§226.4 OPERATING REQUIREMENTS

Except as otherwise allowed by the department pursuant to section 226.5 of this Part, the following operating practices are required by a person conducting solvent metal cleaning:

- (a) Cold cleaning degreasing. Clean parts shall be drained at least 15 seconds or until dripping ceases.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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



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

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

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

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

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

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

Condition 52: Contaminant List
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable State Requirement:ECL 19-0301

Item 52.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000079-01-6
Name: TRICHLOROETHYLENE



CAS No: 000106-94-5
Name: PROPANE, 1-BROMO-

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

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

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

Condition 53: Malfunctions and start-up/shutdown activities
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable State Requirement:6 NYCRR 201-1.4

Item 53.1:

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

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

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

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

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



listed above must be adhered to in such circumstances.

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

Condition 54: Compliance Demonstration
Effective between the dates of 10/23/2013 and 10/22/2018

Applicable State Requirement: 6 NYCRR 212.9 (b)

Item 54.1:

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

Item 54.2:

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 is taken to give an indication of the proper operation of the control device. This measurement is not a compliance measurement. The compliance option chosen for this source is the alternative MACT standard.

(2) The measurement shall be taken weekly with a colorimetric detector tube, photoionization detector (PID) or similar measuring device. This measurement shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber.

(3) The measurement device shall be calibrated as required by the manufacture and the measurement corrected for TCE, if required.

(4) If the TCE exhaust concentration is greater than 100 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.

(5) If the facility is unable to correct the problem

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and the exhaust concentration remains above 100 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.

(6) 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 100 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 1/30/2014.

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

