New York State Department of Environmental Conservation
Facility DEC ID: 9140200021

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1402-00021/00081
Effective Date: 07/10/2007 Expiration Date: 07/09/2012

Permit Issued To: LUVATA BUFFALO INC
70 SAYRE ST
PO BOX 981
BUFFALO, NY 14240-0981

Contact: KENT W WEBB
LUVATA BUFFALO INC
PO BOX 981
BUFFALO, NY 14240-0981
(716) 879-6875

Facility: LUVATA BUFFALO INC
70 SAYRE ST
BUFFALO, NY 14207-2299

Contact: KENT W WEBB
LUVATA BUFFALO INC
PO BOX 981
BUFFALO, NY 14240-0981
(716) 879-6875

Description:
Luvata Buffalo operates a manufacturing facility located at 70 Sayre Street, in Buffalo, New York in a mixed residential/industrial area. The facility employs approximately 625 people, and generally operates 7 days per week, 52 weeks per year. The site encompasses 79 acres including 1.1 million square feet of manufacturing area, storage and office space. The facility was established under different ownership about 1906, and became Outokumpu American Brass in 1990 and ultimately Luvata in 2006.

The facility manufactures and processes various alloys composed of copper and zinc. The major activities at the facility include: casting, annealing, hot rolling, and milling. In the cast shop, copper and other metals, including zinc alloy, are melted in electric induction furnaces and poured off into water cooled molds to form hot cakes. After heating, cakes may then be hot rolled to various thicknesses followed by being run through a milling line to create a uniform thickness. Various types of annealing furnaces are used to slowly heat and cool the alloy materials resulting in added strength and reduced brittleness. Depending on the material, strand anneals, bell anneals or cup annealing furnaces could be used. At the end of the annealing process, strand materials are generally run through an acidic bath to remove scale and metal oxides that have formed prior to being re-wound. Skimmings, grindings, dross and other materials are routinely sorted and collected for reuse in raw materials.

The facility has continued to expand production in recent years. In 1998 American Brass took over ownership of the four natural gas fired boilers for heat and process steam formerly owned by Encogen Four Partners, LLP. In 1999, the facility permitted a new tinning line in which brass or copper strip passes through a pot of molton tin to apply a thin coating. In late 2000 and early 2001, the facility installed a new cleaning line operation for preparation of brass strip. The facility also has several machining operations, presses, and other metalworking operations that are not vented to the atmosphere. In addition to production, the facility performs several maintenance operations, operates a water treatment facility for production wastewaters, and performs woodworking operations for pallets, etc.

The facility is subject to Title V permitting requirements due primarily to the carbon monoxide generated from the combustion of natural gas in the annealing furnaces and boilers. The facility is subject to Prevention of Significant Deterioration requirements for the same compounds. Emission calculations were prepared using a combination of published emission factors, stack test results, and engineering calculations as discussed in the application.

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: DAVID S DENK
DIVISION OF ENVIRONMENTAL PERMITS
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / _____

New York State Department of Environmental Conservation
Facility DEC ID: 9140200021

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

New York State Department of Environmental Conservation
Facility DEC ID: 9140200021

LIST OF CONDITIONS

DEC GENERAL CONDITIONS
General Provisions
Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and Determinations
Applications for permit renewals, modifications and transfers
Applications for Permit Renewals and Modifications
Permit modifications, suspensions or revocations by the Department
Permit Modifications, Suspensions and Revocations by the Department
Facility Level
Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

DEC GENERAL CONDITIONS
****** General Provisions ******
For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

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

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

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

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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

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

Item 4.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 4.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 4.3:
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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

Item 5.1:
The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

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

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

Item 6.1:
The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

a) materially false or inaccurate statements in the permit application or supporting papers;
b) failure by the permittee to comply with any terms or conditions of the permit;

c) exceeding the scope of the project as described in the permit application;
d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

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

Condition 7: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 7.1:
Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165

New York State Department of Environmental Conservation
Permit ID: 9-1402-00021/00081 Facility DEC ID: 9140200021

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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70 SAYRE ST
PO BOX 981
BUFFALO, NY 14240-0981

Facility: LUVATA BUFFALO INC
70 SAYRE ST
BUFFALO, NY 14207-2299

Authorized Activity By Standard Industrial Classification Code:
3351 - COPPER ROLLING AND DRAWING

Permit Effective Date: 07/10/2007 Permit Expiration Date: 07/09/2012

LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

1 6NYCRR 200.6: Acceptable Ambient Air Quality
2 6NYCRR 201-6.5(a)(7): Fees
3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
6 6NYCRR 201-6.5(e): Compliance Certification
7 6NYCRR 202-2.1: Compliance Certification
8 6NYCRR 202-2.5: Recordkeeping requirements
9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
10 6NYCRR 200.7: Maintenance of Equipment
11 6NYCRR 201-1.7: Recycling and Salvage
12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
18 6NYCRR 201-6.5(f)(6): Off Permit Changes
19 6NYCRR 202-1.1: Required Emissions Tests
20 6NYCRR 211.3: Visible Emissions Limited
21 40CFR 68: Accidental release provisions.
22 40CFR 82, Subpart F: Recycling and Emissions Reduction
23 6NYCRR 201-6: Emission Unit Definition
24 6NYCRR 201-6.5(c)(3): Compliance Certification
25 6NYCRR 201-6.5(g): Non Applicable requirements
26 6NYCRR 212.6(a): Compliance Certification
27 6NYCRR 212.6(a): Compliance Certification

Emission Unit Level

28 6NYCRR 201-6: Emission Point Definition By Emission Unit
29 6NYCRR 201-6: Process Definition By Emission Unit
30 6NYCRR 201-7.1: Emission Unit Permissible Emissions

EU=1-BOILR

31 6NYCRR 227-1.3(a): Compliance Certification
32 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.
33 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Certification

EU=1-BOILR,Proc=NGS,ES=BOILR

34 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Certification

EU=1-CASTS,EP=00030

35 6NYCRR 212.4(c): Compliance Certification

EU=1-CASTS,EP=00055

36 6NYCRR 212.4(c): Compliance Certification

EU=3-STRND
*37 6NYCRR 201-7.1: Capping Monitoring Condition

EU=4-HOTRL,Proc=MIL
38 6NYCRR 212.3(a): Compliance Certification

EU=5-PAINT
39 6NYCRR 212.3(a): Compliance Certification
40 6NYCRR 212.4(c): Compliance Certification

EU=6-TREAT
41 6NYCRR 212.3(a): Compliance Certification

EU=9-TINLN
42 6NYCRR 212.4(a): Compliance Certification
43 6NYCRR 212.4(c): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS
Facility Level
44 ECL 19-0301: Contaminant List
45 6NYCRR 201-1.4: Unavoidable noncompliance and violations
46 6NYCRR 211.2: Air pollution prohibited

NOTE: * preceding the condition number indicates capping.

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

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

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

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

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

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

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to

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

Item C: **Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: **Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: **Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: **Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

order to maintain compliance with the conditions of this permit.

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

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

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

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

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

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

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the

Act;

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

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

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

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

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

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

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

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

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

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 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit

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 07/10/2007 and 07/09/2012

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

Item 2.1:
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 3.1:
The following information must be included in any required compliance monitoring records and reports:

(i) The date, place, and time of sampling or measurements;

(ii) The date(s) analyses were performed;

(iii)The company or entity that performed the analyses;

(iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;

(v) The results of such analyses including quality assurance data where required; and

(vi) The operating conditions as existing at the time of sampling or measurement.

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

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 4.1:
Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable

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 07/10/2007 and 07/09/2012

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

Item 5.1:
The Compliance Certification activity will be performed for the Facility.

Item 5.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
To meet the requirements of this facility permit with respect to reporting, the permittee must:

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

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

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

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

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

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

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

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

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

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

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

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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 6.1:
The Compliance Certification activity will be performed for the Facility.

Item 6.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

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

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

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

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

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

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BQA is as follows:

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

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

Condition 7: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 202-2.1

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

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

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 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:
(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

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

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:
No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

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

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

Condition 10: Maintenance of Equipment
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:
Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:
Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:
No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 13.1:
The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 14.1:
The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 15: Standard Requirement - Provide Information

Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 15.1:
The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 16.1:
The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

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

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

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

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

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 17.1:
Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

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

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

Condition 18: Off Permit Changes
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 18.1:
No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

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

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

Condition 19: Required Emissions Tests
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:
For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 211.3

Item 20.1:

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

Condition 21: Accidental release provisions.
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 40CFR 68

Item 21.1:
If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:
The permittee shall comply with all applicable provisions of 40 CFR Part 82.

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

Condition 23: Emission Unit Definition

Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-BOILR
Emission Unit Description:
The emission unit consists of four 31.5 mmbtu/hr natural gas fired boilers. Emissions are based on emission factors provided by the manufacturer.

Building(s): 0000000AUX

Item 23.2:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-CASTS
Emission Unit Description:
There are four casting stations in operation at the Luvata facility, designated as castings stations 2, 3, 4, and 5. Copper stock and alloying elements are melted in electric induction furnaces and poured into water cooled molds to form cakes. Fluxing agents are used for mold release. Natural gas preheat torches are used at each casting station to maintain the temperature of the runner boxes. Overhead fans are used to vent fugitive emissions. Casting stations 2 and 3 have five fans each, casting station 4 has three fans, and casting station 5 has four fans. In addition, emissions from casting stations 2 through 4 are vented to a baghouse. Emissions from casting station 5 are vented to a second baghouse.

Building(s): CASTSHOP

Item 23.3:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 2-ANEAL
Emission Unit Description:
There are three types of annealing equipment in use at the Luvata facility: strand anneals, bell anneals, and cup annealing furnaces. Copper alloy stock is heat treated in one of the three types of furnaces depending on the desired properties. The furnaces use natural gas to generate a carbon-rich atmosphere to heat-treat the metal.

Building(s): 24

29
2A
31
33
PRESSRM
STANNEAL

Item 23.4:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 3-STRND
Emission Unit Description:
The 148 strand anneal furnace uses natural gas to generate a carbon-rich atmosphere to heat-treat the metal.

Building(s): STANNEAL

Item 23.5:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 4-HOTRL
Emission Unit Description:
Two natural gas furnaces are used to heat cakes of copper alloy prior to rolling. Emissions from these furnaces are from the combustion of natural gas. After rolling, bars are surface milled. Chips are transported by a vacuum system, are collected by two cyclones and a scrubber (installed january 2005). The collected chips are recycled.

Building(s): 25A
CAKESTRG

Item 23.6:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 5-PAINT
Emission Unit Description:
A paint spray booth is operated at the facility. The booth is operated 6 hours per day, 90 days per year. The booth is equipped with a fan and particulate air filter. This emission unit is exempt per 6 NYCRR Part 201-3.2(c)(17) Surface coating and related operations which use less than 25 gallons per month of coating materials (paints) and cleaning solvents, combined, subject to the following:
(i) the facility is located outside of any severe ozone nonattainment area; and

(ii) all abrasive cleaning and surface coating operations are performed in an enclosed building where such operations are exhausted into appropriate emission control devices.

Building(s): SCRAPSTG

Item 23.7:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 6-TREAT
Emission Unit Description:
A steam jacket dryer is used to dry filter cake at the wastewater treatment plant. A wet scrubber is used to control emissions. Control efficiency of the scrubber is 99%.

Building(s): 1

Item 23.8:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 7-CRACK
Emission Unit Description:
A cracking tank is used to reclaim oil from an oil/water emulsion. Emissions of hydrogen sulfide and oil mist are vented through emission point 00050.

Building(s): TUBEBAY

Item 23.9:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 8-SHAKE
Emission Unit Description:
The sorting shaker table is used to sort the casting stations' skimming and runner box debris prior to being sent out for brass/copper reclamation. Wetting the contents of the skimming boxes prior to dumping on the shaker table helps to minimize dust from this operation.

Building(s): SCRAPSTG

Item 23.10:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 9-TINLN
Emission Unit Description:
The emission unit consists of a flux application tank, an on-line molten tin application tank, a refining station

molten tin tank and a scrubber to reduce emissions to atmosphere.

Building(s): N CON. BAY

Condition 24: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 24.1:
The Compliance Certification activity will be performed for the Facility.

Item 24.2:
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.

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 Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 25: Non Applicable requirements
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 25.1:
This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6NYCRR 212.10
Reason: The facility has potential to emit volatile organic compounds above the major source threshold. The VOC RACT provisions of Part 212.10 do not apply because the potential emissions of all VOC sources at the facility are below 3 pounds per hour.

Condition 26: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 26.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 2-ANEAL

Emission Unit: 3-STRND

Emission Unit: 4-HOTRL

Emission Unit: 5-PAINT

Emission Unit: 6-TREAT

Emission Unit: 1-CASTS

Emission Unit: 9-TINLN

Item 26.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
The facility owner or operator will observe all emission points visible from ground level within the boundaries of the facility daily during daylight hours. Should visible emissions appear to be potentially in excess of 20% opacity, the facility owner or operator shall determine the cause immediately and make the necessary correction(s). The records of these observations will be recorded in a bound log book at the facility and shall be made available to the Department upon request. Records will be maintained for a minimum of 5 years.

If after corrections are made and the emissions appear to be potentially in excess of 20% opacity, the facility owner or operator will conduct a Method 9 assessment to determine the degree of opacity. The Department reserves the right to perform or require the performance of a Method 9 evaluation.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 27.1:
The Compliance Certification activity will be performed for the Facility.

Item 27.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

1. If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this may be zero percent opacity for many or all stacks), the facility owner shall determine the cause immediately and make the necessary correction. The facility owner and/or operator will observe all emission points or other sources of air pollution daily during daylight hours to monitor for unusual opacity conditions. The records of these observations will be recorded in a bound log book at the facility and shall be available for inspection by Department representatives upon request. Records will be maintained for a period of at least five years.

2. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the facility owner will conduct a Method 9 assessment to determine the degree of opacity.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 22)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Condition 28: Emission Point Definition By Emission Unit
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 28.1:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-BOILR

Emission Point: AUX01
Height (ft.): 87 Diameter (in.): 23
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 0000000AUX

Emission Point: AUX02
Height (ft.): 87 Diameter (in.): 23
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 0000000AUX

Emission Point: AUX03
Height (ft.): 87 Diameter (in.): 23
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 0000000AUX

Emission Point: AUX04
Height (ft.): 87 Diameter (in.): 23
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 0000000AUX

Item 28.2:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-CASTS

Emission Point: 00030
Height (ft.): 28 Diameter (in.): 12
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Emission Point: 00033
Height (ft.): 58 Diameter (in.): 48
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Emission Point: 00034
Height (ft.): 58 Diameter (in.): 48
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Emission Point: 00040
Height (ft.): 58 Diameter (in.): 48
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Emission Point: 00055
Height (ft.): 60 Diameter (in.): 30

NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: CASTSHOP

Item 28.3:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 2-ANEAL

Emission Point: 00056
Height (ft.): 100 Diameter (in.): 42
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 24

Emission Point: 00057
Height (ft.): 100 Diameter (in.): 45
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 29

Emission Point: 00058
Height (ft.): 82 Length (in.): 20 Width (in.): 24
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: STANNEAL

Emission Point: 00059
Height (ft.): 118 Length (in.): 26 Width (in.): 26
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 31

Emission Point: 00060
Height (ft.): 118 Length (in.): 29 Width (in.): 30
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 33

Emission Point: 00063
Height (ft.): 40 Diameter (in.): 2
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: PRESSRM

Emission Point: 00064
Height (ft.): 40 Diameter (in.): 2
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: PRESSRM

Emission Point: 00065
Height (ft.): 40 Length (in.): 5 Width (in.): 17
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 2A

Emission Point: 00066
Height (ft.): 40 Diameter (in.): 5
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 2A

Emission Point: 00067
Height (ft.): 40 Length (in.): 5 Width (in.): 17
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 2A

Emission Point: 00068
Height (ft.): 26 Length (in.): 5 Width (in.): 17
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 2A

Emission Point: 00069
Height (ft.): 26 Length (in.): 5 Width (in.): 17
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: 2A

Item 28.4:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 3-STRND

Emission Point: 00061
Height (ft.): 40 Diameter (in.): 9
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: STANNEAL

Emission Point: 00062
Height (ft.): 40 Diameter (in.): 9
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: STANNEAL

Item 28.5:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 4-HOTRL

Emission Point: 00037 Removal Date: 12/01/2004
Height (ft.): 28 Length (in.): 48 Width (in.): 48
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Emission Point: 00038 Removal Date: 12/01/2004
Height (ft.): 28 Length (in.): 48 Width (in.): 48
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Emission Point: 00039 Removal Date: 12/01/2004
Height (ft.): 43 Length (in.): 31 Width (in.): 31
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Emission Point: 00070
Height (ft.): 50 Length (in.): 46 Width (in.): 64
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: CAKESTRG

Emission Point: 00071
Height (ft.): 50 Length (in.): 36 Width (in.): 68
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: CAKESTRG

Emission Point: 00100

Height (ft.): 69 Diameter (in.): 70
NYTMN (km.): 4762.3 NYTME (km.): 182.4 Building: 25A

Item 28.6:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 5-PAINT

Emission Point: 00051
Height (ft.): 39 Diameter (in.): 30
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Item 28.7:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 6-TREAT

Emission Point: 00048
Height (ft.): 39 Diameter (in.): 16
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Item 28.8:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 7-CRACK

Emission Point: 00050
Height (ft.): 39 Diameter (in.): 20
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Item 28.9:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 8-SHAKE

Emission Point: 00052
Height (ft.): 43 Diameter (in.): 36
NYTMN (km.): 4762.52 NYTME (km.): 182.429

Item 28.10:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 9-TINLN

Emission Point: 00080
Height (ft.): 49 Diameter (in.): 32
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: N CON. BAY

Emission Point: 00081
Height (ft.): 49 Diameter (in.): 13
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: N CON. BAY

Emission Point: 00082
Height (ft.): 49 Diameter (in.): 13
NYTMN (km.): 4762.52 NYTME (km.): 182.429 Building: N CON. BAY

Condition 29: Process Definition By Emission Unit
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 29.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-BOILR
Process: NGS Source Classification Code: 1-02-006-02
Process Description:
Natural gas is combusted in four boilers to generate steam for the outokumpu american brass facility. The boilers are subject to nsps subpart dc.

Emission Source/Control: BOILR - Combustion
Design Capacity: 31.5 million Btu per hour

Emission Source/Control: BURNR - Combustion

Item 29.2:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-BOILR
Process: PRP Source Classification Code: 1-02-010-02
Process Description:
Propane is used as an emergency fuel for the four boilers. The boilers are subject to nsps subpart dc. Propane use is limited to a maximum of 30 days per year.

Emission Source/Control: BOILR - Combustion
Design Capacity: 31.5 million Btu per hour

Emission Source/Control: BURNR - Combustion

Item 29.3:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-CASTS
Process: CAS Source Classification Code: 3-04-050-01
Process Description:

Copper and alloying elements, including zinc alloy, are melted in electric induction furnaces and poured off into water cooled molds to form flat cakes. Charcoal, carbon black, and other fluxing agents are used to minimize excessive fuming. Two baghouses are utilized to control emissions. Overhead roof fans are also used to alleviate fugitive emissions.

Emission Source/Control: C5BH1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: C5BH2 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CSBH1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CSBH2 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CAST2 - Process

Emission Source/Control: CAST3 - Process

Emission Source/Control: CAST4 - Process

Emission Source/Control: CAST5 - Process

Item 29.4:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-CASTS
Process: HTR Source Classification Code: 3-03-900-03
Process Description:

Natural gas is combusted in preheat torches at each of the five casting stations to maintain the temperature of the molten alloy as it is being pouted through the runner boxes. Emissions are vented through the baghouses as well as the overhead roof fans.

Emission Source/Control: TORCH - Process

Item 29.5:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 2-ANEAL
Process: ANL Source Classification Code: 3-03-009-34
Process Description:

There are 12 annealing furnaces installed prior to 1970 in use at the facility to heat treat copper alloy. There are 3 types: strand anneals, bell anneals, and annealing furnaces. The 12 furnaces are located across 7 different buildings: building #24, #29, #31, #33, 2a, press room and the strip anneal bay. The furnaces use natural gas to create a carbon rich atmosphere for treating the alloy. The heat treating enhances the physical properties of the alloy making it stronger and/or more malleable. This process is similar to the annealing process used in the steel industry, however the same emission factors do not apply. Emissions from the annealing furnaces at the oab facility are based on stack testing results and natural gas usage records.

Emission Source/Control: 121BL - Combustion

Emission Source/Control: 125BL - Combustion

Emission Source/Control: 127BL - Combustion

Emission Source/Control: 128BL - Combustion

Emission Source/Control: 129BL - Combustion

Emission Source/Control: 132ST - Combustion

Emission Source/Control: 133ST - Combustion

Emission Source/Control: 134ST - Combustion

Emission Source/Control: 135AN - Combustion

Emission Source/Control: 138AN - Combustion

Emission Source/Control: 143ST - Combustion

Emission Source/Control: 147ST - Combustion

Item 29.6:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 3-STRND

Process: STR Source Classification Code: 3-03-009-34
Process Description:
An additional strand annealing furnace is in use at the facility to heat treat copper alloy, the 148 strand. This furnace uses natural gas to create a carbon rich atmosphere for treating the alloy. The heat treating enhances the physical properties of the alloy. This process is similar to the annealing process used in the steel industry, however the same emission factors do not apply. Emissions from the annealing furnaces at the oab facility are based on stack testing results and natural gas usage records . the 148 strand anneal furnace was installed after 1974 and is subject to compliance with psd regulations.

Emission Source/Control: 148ST - Combustion

Item 29.7:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 4-HOTRL
Process: CHT Source Classification Code: 3-99-900-03
Process Description:
Natural gas is used to fire two furnaces, the 130 and 146 cake heaters. These furnaces are used to heat cakes of copper alloy prior to hot or cold rolling.

Emission Source/Control: 130CH - Combustion

Emission Source/Control: 146CH - Combustion

Item 29.8:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 4-HOTRL
Process: MIL Source Classification Code: 3-05-150-03
Process Description:
Copper alloy bars are surface milled at the torin mill, generating chips which are transported by a vacuum system. The chips are collected by a centrifugal precipitator and a rotoclone and are recycled. A second milling line, the mckay line, is used as a backup. Chips generated by this line are transported by a vacuum system and collected by a wet-type cyclone.

Emission Source/Control: TORIN - Process

Item 29.9:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 5-PAINT
Process: PNT Source Classification Code: 4-02-001-01
Process Description:
Painting is conducted in a paint booth approximately 6 hours per day, 90 days per year. Emissions include voc and particulates. Particulate emissions are controlled by a particulate air filter.

Emission Source/Control: PTBTH - Process

Item 29.10:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 5-PAINT
Process: THN Source Classification Code: 4-02-009-20
Process Description:
Cleanup of painting equipment is conducted in the paint booth. Voc emissions are generated by the use of mineral spirits as a solvent for paint thinning/cleanup.

Emission Source/Control: PTBTH - Process

Item 29.11:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 6-TREAT
Process: DRY Source Classification Code: 3-99-999-94
Process Description:
A steam jacket dryer is used to dry filter cake at the wastewater treatment plant. A wet scrubber is used to control emissions. Control efficiency of the scrubber is 99%.

Emission Source/Control: DRYER - Control
Control Type: WET SCRUBBER

Emission Source/Control: STMJK - Process

Item 29.12:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 7-CRACK
Process: OIL Source Classification Code: 3-99-999-95
Process Description:

Soluble oil and water is used as a coolant in the rolling operations at the facility. The oil and water emulsion is collected and separated in a cracking tank. The emissions from this process were calculated as part of the emission inventory and were found to be insignificant.

Emission Source/Control: CRKTK - Process

Item 29.13:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 8-SHAKE
Process: SHK Source Classification Code: 3-99-999-94
Process Description:
A sorting shaker table is used to sort the casting stations' skimming and runner box debris prior to being sent out for brass and copper reclamation. The emissions from this process were calculated in the emission inventory and were determined to be insignificant.

Emission Source/Control: STSHK - Process

Item 29.14:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 9-TINLN
Process: GAS Source Classification Code: 3-04-002-99
Process Description:
Natural gas is combusted in the flux dryer to provide heat to dry the flux before entering the tin bath, and in the on-line tin pot and refining tin pot to provide heat and maintain temperatures necessary to keep the tin molten.

Emission Source/Control: FLUXD - Process
Design Capacity: 300 feet per minute

Emission Source/Control: ONLIN - Process
Design Capacity: 300 feet per minute

Emission Source/Control: REFIN - Process

Item 29.15:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 9-TINLN
Process: TIN Source Classification Code: 3-04-002-99

Process Description:
Emissions collected by the scrubber system include hcl from the flux tank, flux dryer, and from the refining station. Zinc oxide mist is also collected by the scrubber system, from the refining station.

Emission Source/Control: SCR80 - Control
Control Type: WET SCRUBBER

Emission Source/Control: FLUXD - Process
Design Capacity: 300 feet per minute

Emission Source/Control: REFIN - Process

Condition 30: Emission Unit Permissible Emissions
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 30.1:
The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 3-STRND

CAS No: 000630-08-0
Name: CARBON MONOXIDE
PTE(s): 21.7 pounds per hour
190,000 pounds per year

Condition 31: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

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

Item 31.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BOILR

Item 31.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
No owner or operator of a combustion installation shall

emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 32: EPA Region 2 address.
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 40CFR 60.4, NSPS Subpart A

Item 32.1:
This Condition applies to Emission Unit: 1-BOILR

Item 32.2:
All requests, reports, applications, submittals, and other communications to the Administrator pursuant to this part shall be submitted in duplicate to the following address:

Director, Division of Enforcement and Compliance Assistance
USEPA Region 2
290 Broadway, 21st Floor
New York, NY 10007-1886

Copies of all correspondence to the administrator pursuant to this part shall also be submitted to the NYSDEC Regional Office issuing this permit (see address at the beginning of this permit) and to the following address:

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

Condition 33: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 40CFR 60.48c(g), NSPS Subpart Dc

Item 33.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BOILR

Item 33.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Monitoring Frequency: DAILY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 40CFR 60.48c(i), NSPS Subpart Dc

Item 34.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BOILR
Process: NGS Emission Source: BOILR

Item 34.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 35: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 35.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-CASTS Emission Point: 00030

Item 35.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Flow through the baghouse will be measured on the outlet of the baghouse. A minimum flow of 70,000 cfm and a maximum flow of 110,000 cfm will be monitored to demonstrate that the bags are intact, but not overloaded.

An alarm condition for a flow below 70,000 cfm would indicate blinding, or other obstruction, and would result in a system check and maintenance activity initiated within 24 hours. An alarm condition for a flow above 110,000 cfm would result in the individual baghouse module being shut down and the bags would be replaced before being brought on-line.

Audible alarms for high and low flow are installed.

Parameter Monitored: AIR FLOW
Lower Permit Limit: 70,000 cubic feet per minute
Upper Permit Limit: 110,000 cubic feet per minute
Monitoring Frequency: CONTINUOUS
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 36: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 36.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-CASTS Emission Point: 00055

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Flow through the baghouse will be measured on the outlet of the baghouse. A minimum flow of 15,000 cfm and a maximum flow of 45,000 cfm will be monitored to demonstrate that the bags are intact, but not overloaded.

An alarm condition for a flow below 15,000 cfm would indicate blinding, or other obstruction, and would result in a system check and maintenance activity initiated within 24 hours. An alarm condition for a flow above 45,000 cfm would result in the individual baghouse module being shut down and the bags would be replaced before being brought on-line.

Audible alarms for high and low flow are installed.

Parameter Monitored: AIR FLOW
Lower Permit Limit: 15,000 cubic feet per minute
Upper Permit Limit: 45,000 cubic feet per minute
Monitoring Frequency: CONTINUOUS
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 37: Capping Monitoring Condition
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 37.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40CFR 52-A.21

Item 37.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits,

terms, conditions and standards in this permit.

Item 37.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 37.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 37.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 37.6:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STRND

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

Item 37.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Natural gas usage for the 148 strand anneal will be monitored to ensure that the CO emission limit of 100 tpy is not exceeded. Based on the 1994 stack test data, natural gas usage shall be limited to 4,147,465 ft/3 per year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Parameter Monitored: NATURAL GAS
Upper Permit Limit: 4,147,465 cubic feet per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 38.1:
The Compliance Certification activity will be performed for:

Emission Unit: 4-HOTRL
Process: MIL

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

Item 38.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Maintenance of the vacuum system and cyclones will be performed to ensure the proper operation and collection efficiency. Equipment will be visibly inspected on a weekly basis to determine the need for cleaning.

Monitoring Frequency: WEEKLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 39.1:
The Compliance Certification activity will be performed for:

Emission Unit: 5-PAINT

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

Item 39.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Maintenance of the spray gun and particulate filter will be performed to ensure the proper operation and collection efficiency of the equipment. For weeks in which the spray booth is used, equipment will be cleaned weekly to meet this requirement. Records will be maintained for a period of at least five years.

Monitoring Frequency: WEEKLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 40: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 40.1:
The Compliance Certification activity will be performed for:

Emission Unit: 5-PAINT

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

Item 40.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

If this condition appears in a Title V permit, and the Department has not otherwise directed the permittee to conduct a stack test, compliance with the 0.050 grains/dscf particulate emission standard will be determined by the permittee's observation of the outlet of the emission source to determine whether or not visible

emissions are present following the guidelines similar to EPA Method 22. Visible emissions will not include those due to water vapor that is present in the exhaust gas. Observations must be made once per day while operations are taking place. These observations must be recorded in a log book, and be made available to the Department on request. If visible emissions are observed for two consecutive days, a Method 9 visible emissions test must be conducted by a certified observer. If the Method 9 test determines that the opacity is less than 20%, observations of the stack in question shall be used to determine that the opacity of these emissions remain less than 20%.

The semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these observations as well an instances in which visible emissions were observed or in which observations could not be made due to weather conditions.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 41.1:
The Compliance Certification activity will be performed for:

Emission Unit: 6-TREAT

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

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Maintenance of the scrubber will be performed to ensure operation of the equipment at maximum collection efficiency. Equipment will be inspected weekly to meet this requirement. Records must be maintained at the facility for five years.

Monitoring Frequency: WEEKLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 42: Compliance Certification
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 42.1:
The Compliance Certification activity will be performed for:

Emission Unit: 9-TINLN

Regulated Contaminant(s):
CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 42.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The scrubber must be operated at all times of operation. The scrubber must be operated and maintained according to the manufacturers specifications. The owner or operator of this emission source must maintain all required records on site for a period of five (5) years.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 43: Compliance Certification

Effective between the dates of 07/10/2007 and 07/09/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 43.1:
The Compliance Certification activity will be performed for:

Emission Unit: 9-TINLN

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

Item 43.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

If this condition appears in a Title V permit, and the Department has not otherwise directed the permittee to conduct a stack test, compliance with the 0.050 grains/dscf particulate emission standard will be determined by the permittee's observation of the outlet of the emission source to determine whether or not visible emissions are present following the guidelines similar to EPA Method 22. Visible emissions will not include those due to water vapor that is present in the exhaust gas. Observations must be made once per day while operations are taking place. These observations must be recorded in a log book, and be made available to the Department on request. If visible emissions are observed for two consecutive days, a Method 9 visible emissions test must be conducted by a certified observer. If the Method 9 test determines that the opacity is less than 20%, observations of the stack in question shall be used to determine that the opacity of these emissions remain less than 20%.

The semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these observations as well an instances in which visible emissions were observed or in which observations could not be made due to weather

conditions.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
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 44: **Contaminant List**
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable State Requirement: ECL 19-0301

Item 44.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this

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

CAS No: 000630-08-0
Name: CARBON MONOXIDE

CAS No: 007647-01-0
Name: HYDROGEN CHLORIDE

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

Condition 45: Unavoidable noncompliance and violations
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable State Requirement: 6NYCRR 201-1.4

Item 45.1:
At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

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

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

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant

emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

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

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

Condition 46: Air pollution prohibited
Effective between the dates of 07/10/2007 and 07/09/2012

Applicable State Requirement: 6NYCRR 211.2

Item 46.1:
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.