

**New York State Department of Environmental Conservation  
Facility DEC ID: 9149900067**



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 9-1499-00067/00012  
Mod 0 Effective Date: 05/30/2007 Expiration Date: 05/29/2012  
Mod 1 Effective Date: 07/25/2007 Expiration Date: 05/29/2012

Permit Issued To: ISG LACKAWANNA LLC  
3175 LAKESHORE RD  
BUFFALO, NY 14219

Contact: MYLES R LALLEY  
ISG LACKAWANNA LLC  
3175 LAKESHORE RD  
BUFFALO, NY 14219-1407  
(716) 821-3213

Facility: ISG LACKAWANNA LLC  
3175 LAKESHORE RD  
BLASDELL, NY 14219

**Description:**

This facility processes steel coils to specific customer requirements. The #3 Pickle Line uses hydrochloric acid dip tanks to remove scale from the steel strip. The Batch Annealing consists of natural gas-fired ovens ranging from 20.8 to 26.6 MMBtu/hr. The steel can also be processed on a Tandem Mill or Temper Mill. The Galvanize Line consists of pickling and cleaning sections, a 46.2 MMBtu/hr natural gas-fired flux drying oven, the zinc coating pot, a natural gas-fired 40 MMBtu/hr post anneal furnace followed by a post coating treatment section. Supporting operations for the facility consist of 2 roll shot blasters, grinders and a water treatment area containing lime silos.

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: STEVEN J DOLESKI  
DIVISION OF ENVIRONMENTAL PERMITS  
270 MICHIGAN AVE  
BUFFALO, NY 14203-2999

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



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for permit renewals, modifications and transfers

Applications for Permit Renewals and Modifications

Permit modifications, suspensions or revocations by the Department

Permit Modifications, Suspensions and Revocations by the Department

**Facility Level**

Submission of application for permit modification or renewal-REGION 9  
HEADQUARTERS



**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

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

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

**Item 2.1:**

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

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

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**



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

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

**Item 4.1:**

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

**Item 4.2:**

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

**Item 4.3:**

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

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

**Item 5.1:**

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

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

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

**Item 6.1:**

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

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

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

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

**Condition 7: Submission of 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



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

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

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3175 LAKESHORE RD  
BUFFALO, NY 14219

Facility: ISG LACKAWANNA LLC  
3175 LAKESHORE RD  
BLASDELL, NY 14219

Authorized Activity By Standard Industrial Classification Code:  
3316 - COLD FINISHING OF STEEL SHAPES

Mod 0 Permit Effective Date: 05/30/2007

Permit Expiration Date: 05/29/2012

Mod 1 Permit Effective Date: 07/25/2007

Permit Expiration Date: 05/29/2012



**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
  - 25 40CFR 63.4, Subpart A: Prohibitions
  - 26 40CFR 63.6(e)(1)(i), Subpart A: Operation and Maintenance Requirements
  - 27 40CFR 63.6(e)(3), Subpart A: Startup, Shutdown and Malfunction
  - 28 40CFR 63.8, Subpart A: Monitoring Requirements
  - 29 40CFR 63.9, Subpart A: 40 CFR 63.9 (b)(1),(2) Initial Notification Requirement
  - 30 40CFR 63.10, Subpart A: § 63.10(b) General Recordkeeping Requirements
  - 31 40CFR 63.10, Subpart A: §63.10(d) General Reporting Requirements
  - 32 40CFR 63, Subpart DDDDD: Applicability of 40 CFR 63 Subpart DDDDD
- Emission Unit Level**
- 33 6NYCRR 201-6: Emission Point Definition By Emission Unit
  - 34 6NYCRR 201-6: Process Definition By Emission Unit

**EU=2-00001**

- 35 40CFR 63.1155, Subpart CCC: Applicability statement - including Subpart A General Provisions



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- 36 40CFR 63.1159, Subpart CCC: Operational and equipment standards for hydrochloric acid storage vessels
- 37 40CFR 63.1160(a), Subpart CCC: Compliance dates for existing steel pickling facilities
- 38 40CFR 63.1160(b), Subpart CCC: Maintenance requirements
- 1-1 40CFR 63.1161(a), Subpart CCC: Compliance Certification
- 39 40CFR 63.1161(a), Subpart CCC: Compliance Certification
- 40 40CFR 63.1161(b), Subpart CCC: Establishment of scrubber operating parameters
- 41 40CFR 63.1162(a)(2), Subpart CCC: Compliance Certification
- 42 40CFR 63.1162(c), Subpart CCC: Compliance Certification
- 43 40CFR 63.1163(b), Subpart CCC: Request for extension of compliance
- 44 40CFR 63.1165, Subpart CCC: Compliance Certification

**EU=2-00001,Proc=130**

- 45 6NYCRR 212.3(a): Compliance Certification
- 46 6NYCRR 212.6(a): Compliance Certification

**EU=2-00001,EP=52203**

- 47 6NYCRR 212.3(a): Emissions from existing sources

**EU=2-00002**

- 48 6NYCRR 212.6(a): Compliance Certification

**EU=2-00005,Proc=270**

- 49 6NYCRR 212.6(b): Compliance Certification
- 50 6NYCRR 212.6(b): Compliance Certification
- 51 6NYCRR 212.6(b): Compliance Certification
- 52 6NYCRR 212.6(b): Compliance Certification

**EU=2-00005,EP=68301,Proc=250**

- 53 6NYCRR 212.6(a): Compliance Certification

**EU=2-00005,EP=68301,Proc=270**

- 54 6NYCRR 212.4(c): Compliance Certification

**EU=2-00005,EP=68304,Proc=260**

- 55 6NYCRR 212.6(a): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 56 ECL 19-0301: Contaminant List
- 57 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 58 6NYCRR 211.2: Air pollution prohibited



**FEDERALLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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order to maintain compliance with the conditions of this permit.

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

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

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

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

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

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

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

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Act;

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

**Condition 1: Acceptable Ambient Air Quality**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 6NYCRR 200.6**

**Item 1.1:**

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



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

**Condition 2: Fees**

**Effective between the dates of 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

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

**Item 4.1:**

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



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

**Condition 5: Compliance Certification**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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

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

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

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

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

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

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

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

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 7/30/2007.

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

**Condition 6: Compliance Certification**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

**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:

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Compliance certifications shall contain the following information:

- 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.

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.

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 Compliance Monitoring and Enforcement (BCME) 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

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The address for the BCME is as follows:

NYSDEC  
Bureau of Compliance Monitoring  
and Enforcement  
625 Broadway  
Albany, NY 12233-3258

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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**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.



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(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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

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**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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**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



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information or otherwise has need of it.

**Condition 16: General Condition - Right to Inspect**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**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,



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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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 68**

**Item 21.1:**



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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 05/30/2007 and 05/29/2012**

**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 05/30/2007 and 05/29/2012**

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

**Item 23.1(From Mod 1):**

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

Emission Unit: 2-00001

Emission Unit Description:

The #3 Pickle Line removes surface scale and oxides from the steel strip. The continuous processing line consists of four processes: 1) welding, 2) tempering/descaling, 3)



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pickling, and 4) slitting & oiling. The pickling process, controlled by a wet scrubber, vents through a stack. Two spent pickle liquor tanks are vented to the pickling fume exhaust system. The building roof monitor serves as an emission point for the remaining processes. This unit is located in the Cold Mill building. There are also two HCl storage tanks located in the Cold Mill building associated with this unit.

Building(s): 412

**Item 23.2(From Mod 0):**

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

Emission Unit: 2-00002

Emission Unit Description:

Reduction rolling reduces steel strip gauge while temper rolling restores the proper degree of hardness, improves the strip flatness and imparts the desired surface finish to the strip. Before shipping, the strip can be slit to a customer's desired width and roll coated with a protective oil. The four processes which make up this unit are reduction rolling, temper rolling/oiling and packaging/oiling. The only emission point for this unit is the Tandem Mill roof monitor which vents these four processes. These processes are located in the Cold Mill building.

Building(s): 412

**Item 23.3(From Mod 0):**

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

Emission Unit: 2-00003

Emission Unit Description:

Batch annealing is a heat treating process in which steel coils are heated in an inert atmosphere to a temperature of approximately 1300 deg. F., held at that temperature for a specified time period and cooled to ambient temperatures. Annealing is the only process in this unit and its emission points are the roof monitors above the annealing bases. The annealing furnaces are located in the cold mill building. 11 batch anneal furnaces are rated at 20.8 MMBtu/hr. 1 batch anneal furnace is rated at 26.6 MMBtu/hr. All are fired on natural gas only.

Building(s): 412

**Item 23.4(From Mod 0):**



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

Emission Unit: 2-00004

Emission Unit Description:

The roll shops and maintenance unit consists of the process of roll grinding, where pickle line, galvanized line, tandem mill, and temper mill rolls are ground to improve the roll surface. The roll grinders are located in the Cold Mill building and have no emission point.

Building(s): 412

**Item 23.5(From Mod 0):**

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

Emission Unit: 2-00005

Emission Unit Description:

The hot dip galvanize line cleans the steel strip before coating it with molten zinc and drying or annealing the strip. The continuous process line consists of 10 processes: 1) welding, 2) cleaning/pickling, 3) drying/preheating, 4) galvanizing, 5) annealing, 6) quenching/rinsing, 7) chemical treating, 8) printing, 9) oiling, and 10) slitting/oiling. The cleaning section vents to a fume scrubber and subsequently a stack. The zinc coating pot also vents to a fume scrubber and out a stack. The drying/preheating oven, annealing oven, and chemical treatment process exhaust through separate stacks. Emissions from the remaining processes vent through the Galvanize Building roof monitor. This unit is located in the Galvanize Building.

Building(s): 757

**Item 23.6(From Mod 0):**

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

Emission Unit: 2-00007

Emission Unit Description:

Water Quality Control Station No. 7 treats acidic and oily wastewater before it is discharged into Smokes Creek. The three processes are chemical reaction, filtration, and holding. Filtration, and holding in Reactor A are in the Water Quality Control and related buildings while Reactor B is outside near these buildings. Emissions vent through the building's roof monitors, except Reactor B which has fugitive emissions. This emission unit also contains lime silos which are equipped with a baghouse and are thus exempt sources.



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Building(s): 2005

**Condition 25: Prohibitions**

**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.4, Subpart A**

**Item 25.1:**

The facility is required to comply with Part 63 requirements regardless of whether those requirements have been included in a Title V (6NYCRR part 201-6) permit for the source.

Intentional or unintentional concealment of an emission that would otherwise violate a standard is itself a violation.

**Condition 26: Operation and Maintenance Requirements**

**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.6(e)(1)(i), Subpart A**

**Item 26.1:**

At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required in §63.6(e)(3). Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in §63.6(e)(3)), review of operation and maintenance records, and inspection of the source.

**Condition 27: Startup, Shutdown and Malfunction**

**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.6(e)(3), Subpart A**

**Item 27.1:**

The owner or operator of an applicable source shall develop and implement a written startup, shutdown and malfunction (SSM) plan that describes in detail procedures for operating and maintaining the source during periods of SSM and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Consult 40 CFR 63.6(e)(3) (i through viii) for specific requirements regarding SSM plans.

**Condition 28: Monitoring Requirements**

**Effective between the dates of 05/30/2007 and 05/29/2012**

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**Applicable Federal Requirement: 40CFR 63.8, Subpart A**

**Item 28.1:**

**Sources requiring continuous emission monitors.**

40 CFR 63.8 The owner or operator of an affected source shall conduct a performance evaluation of a required continuous emission monitor during any performance test required under §63.7 in accordance with the applicable performance specification as specified in the relevant standard. The owner or operator must submit a site-specific performance evaluation test plan as described in 63.8(e)(3).

**Condition 29: 40 CFR 63.9 (b)(1),(2) Initial Notification Requirement  
Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.9, Subpart A**

**Item 29.1:**

120 days after the effective date of the applicable NESHAP, the source must notify the Department of its compliance status and include a brief description of the nature, size, and design and method of operation of the source as described in 40 CFR 63.9 (b)(1) and (2).

**Condition 30: § 63.10(b) General Recordkeeping Requirements  
Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.10, Subpart A**

**Item 30.1:**

The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum the most recent 2 years of data shall be retained on site. The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source as described in 40 CFR 63.10 (b)(2).

**Condition 31: §63.10(d) General Reporting Requirements  
Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.10, Subpart A**

**Item 31.1:**

The owner or operator of an affected source subject to the reporting requirements under the general provisions shall submit reports to the Department in accordance with the reporting requirements in the relevant standards as described in 40 CFR 63.10 (d).

**Condition 32: Applicability of 40 CFR 63 Subpart DDDDD  
Effective between the dates of 05/30/2007 and 05/29/2012**



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**Applicable Federal Requirement: 40CFR 63, Subpart DDDDD**

**Item 32.1:**

40 CFR 63 Subpart DDDDD establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

ISG Lackawanna is subject to this subpart because they own or operate an industrial, commercial, or institutional boiler or process heater as defined in 40 CFR 63.7575 that is located at, or is part of, a major source of HAP as defined in 40 CFR 63.2 or 40 CFR 63.761 (40 CFR part 63, subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities), except as specified in 40 CFR 63.7491.

As an existing source the only obligation of ISG Lackawanna was to submit an initial notification which was made prior to the date specified in section 40 CFR 63.9(b)(2).

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

**Condition 33: Emission Point Definition By Emission Unit  
Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 33.1(From Mod 0):**

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

Emission Unit: 2-00001

Emission Point: 52203

Height (ft.): 84                      Diameter (in.): 48  
NYTMN (km.): 4747.22    NYTME (km.): 185.029    Building: 412

**Item 33.2(From Mod 0):**

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

Emission Unit: 2-00003

Emission Point: 77090

Height (ft.): 99                      Length (in.):                      Width (in.):  
NYTMN (km.): 4747.22    NYTME (km.): 185.029

Emission Point: 77100

Height (ft.): 137                      Length (in.):                      Width (in.):  
NYTMN (km.): 4747.22    NYTME (km.): 185.029



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**Item 33.3(From Mod 0):**

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

Emission Unit: 2-00005

Emission Point: 68301

Height (ft.): 81

Diameter (in.): 42

NYTMN (km.): 4747.22

NYTME (km.): 185.029

Building: 757

Emission Point: 68303

Height (ft.): 194

Diameter (in.): 72

NYTMN (km.): 4747.22

NYTME (km.): 185.029

Building: 757

Emission Point: 68304

Height (ft.): 133

Diameter (in.): 50

NYTMN (km.): 4747.22

NYTME (km.): 185.029

Building: 757

**Condition 34: Process Definition By Emission Unit**

**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 34.1(From Mod 1):**

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

Emission Unit: 2-00001

Process: 110

Source Classification Code: 3-09-005-00

Process Description:

#3 Pickle Line-Welding - A flash butt welder is located at the entry end of the pickle line. It connects the tail end of one steel strip to the head end of the next strip so that the pickle line can operate continuously. This process has insignificant emissions.

Emission Source/Control: 77020 - Process

**Item 34.2(From Mod 1):**

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

Emission Unit: 2-00001

Process: 120

Source Classification Code: 3-04-007-15

Process Description:

#3 Pickle Line-Tempering/descaling - This roll stand follows the welding process on the pickle line. Its primary function is to maintain tension in the strip as it continues through the pickle line. This process has insignificant emissions.

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Emission Source/Control: 77030 - Process

**Item 34.3(From Mod 1):**

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

Emission Unit: 2-00001

Process: 130

Source Classification Code: 3-03-009-10

Process Description:

#3 Pickle Line-Pickling - Pickling removes surface scale and oxides from the steel strip that were formed in the hot rolling operation. The strip is passed through four tanks containing a hydrochloric acid solution of various concentrations followed by a rinse tank, and dryer. The emissions are controlled by a wet scrubber.

Emission Source/Control: 78290 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 77010 - Process

Emission Source/Control: 77040 - Process

Emission Source/Control: 77060 - Process

Design Capacity: 13 1000 gallons

Emission Source/Control: 78340 - Process

**Item 34.4(From Mod 1):**

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

Emission Unit: 2-00001

Process: 140

Source Classification Code: 3-04-007-15

Process Description:

#3 Pickle Line-Oiling - A protective coating of oil is applied to the steel strip before it is coiled. This process has insignificant emissions.

Emission Source/Control: 77050 - Process

**Item 34.5(From Mod 0):**

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

Emission Unit: 2-00002

Process: 160

Source Classification Code: 3-03-009-35

Process Description:

Reduction Rolling - The 75" 4-high tandem mill uses four



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in-line stands to gradually reduce the gauge of the steel strip depending on the product thickness ordered by the customer. A rolling solution is applied to the steel strip to facilitate rolling.

Emission Source/Control: 77070 - Process

Emission Source/Control: 77080 - Process

**Item 34.6(From Mod 0):**

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

Emission Unit: 2-00002

Process: 170

Source Classification Code: 3-03-009-35

Process Description:

Temper Rolling/Oiling - After heat treating, the steel is rolled on the 4-high single stand Number 6 skin mill.

This rolling performs three functions: 1) restores proper degree of hardness, 2) improves the strip flatness, and 3) imparts the desired surface finish to the strip.

Emission Source/Control: 77120 - Process

**Item 34.7(From Mod 0):**

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

Emission Unit: 2-00002

Process: 190

Source Classification Code: 3-04-007-15

Process Description:

Packaging/Oiling - Coils can be oiled and packaged on either #1 or 2 Packaging Line before shipment. This process has insignificant emissions.

Emission Source/Control: 77130 - Process

Emission Source/Control: 77140 - Process

**Item 34.8(From Mod 0):**

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

Emission Unit: 2-00003

Process: 200

Source Classification Code: 3-03-009-34

Process Description:

Annealing - The heat treating process consists of heating the coils in an inert atmosphere to temperature of about 1300 deg. F, holding at that temperature for a specified time period, and then cooling to ambient temperatures.



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Coils are stacked on pedestals, coated lightly with powder to prevent sticking and covered with a steel cover which is filled with inert gas. A furnace is placed over the stacks and fired with natural gas. Inert gas is piped into the facility from offsite.

Emission Source/Control: 78350 - Process

Emission Source/Control: 78370 - Process

**Item 34.9(From Mod 0):**

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

Emission Unit: 2-00004

Process: 220

Source Classification Code: 3-04-007-15

Process Description:

Roll Grinding - Work roll and backup roll grinders are used to impart a new surface finish on the roll. Generally, the grinding interface is continuously flooded with an aqueous cutting coolant. This process has insignificant emissions.

Emission Source/Control: 77180 - Process

**Item 34.10(From Mod 0):**

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

Emission Unit: 2-00005

Process: 240

Source Classification Code: 3-09-005-00

Process Description:

Hot Dip Galvanize Line-Welding - A lap welder is located at the entry end of the galvanize line. It connects the tail end of one steel strip to the head end of the next strip so that the galvanize line can operate continuously. This process has insignificant emissions.

Emission Source/Control: 78360 - Process

**Item 34.11(From Mod 0):**

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

Emission Unit: 2-00005

Process: 250

Source Classification Code: 3-03-009-10

Process Description:

Hot Dip Galvanize Line-Cleaning - Surface scale and iron oxides are removed as the strip passes through three alkali tanks, one acid pickling tank, and one flux tank.

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The emissions are controlled by a wet scrubber.

Emission Source/Control: 78320 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 77280 - Process

**Item 34.12(From Mod 0):**

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

Emission Unit: 2-00005

Process: 260

Source Classification Code: 3-03-015-80

Process Description:

Hot Dip Galvanize Line-Drying/Preheating - After the cleaning section, the strip passes through a natural gas-fired drying and preheating furnace.

Emission Source/Control: 77290 - Process

**Item 34.13(From Mod 0):**

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

Emission Unit: 2-00005

Process: 270

Source Classification Code: 3-03-009-36

Process Description:

Hot Dip Galvanize Line-Galvanizing - The strip enters the zinc coating pot and emerges from the molten zinc bath with a coating of liquid zinc. Nitrogen is then blown through nozzles against the zinc surface to reduce the zinc thickness to the desired level. Emissions are controlled by a wet scrubber.

Emission Source/Control: 78330 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 77300 - Process

Emission Source/Control: 77310 - Process

**Item 34.14(From Mod 0):**

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

Emission Unit: 2-00005

Process: 280

Source Classification Code: 3-03-009-34

Process Description:

Hot Dip Galvanize Line-Annealing - After being coated with zinc, the strip can be annealed in a natural



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gas-fired continuous annealing furnace.

Emission Source/Control: 77320 - Process

**Item 34.15(From Mod 0):**

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

Emission Unit: 2-00005

Process: 290

Source Classification Code: 3-04-022-11

Process Description:

Hot Dip Galvanize Line-Quenching/Rinsing - Following the annealing section, the strip can pass through a water rinse tank. This also quenches the strip to cool it before being further processed or coiled. This process has insignificant emissions.

Emission Source/Control: 77330 - Process

**Item 34.16(From Mod 0):**

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

Emission Unit: 2-00005

Process: 300

Source Classification Code: 3-03-009-36

Process Description:

Hot Dip Galvanize Line-Chemical Treating - A phosphate or chromate coating is applied to protect the strip's surface. The coating dries as it passes through an electric, infrared oven, and one natural gas-fired dryer.

Emission Source/Control: 77340 - Process

**Item 34.17(From Mod 0):**

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

Emission Unit: 2-00005

Process: 320

Source Classification Code: 3-04-007-15

Process Description:

Hot Dip Galvanize Line-Oiling - Oil is applied as a protective coating to the strip before it is coiled. This process has insignificant emissions.

Emission Source/Control: 77360 - Process

**Item 34.18(From Mod 0):**

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

Emission Unit: 2-00005



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Process: 370

Source Classification Code: 3-04-007-15

Process Description:

Hot Dip Galvanize Line-Slitting/Oiling - Before shipping, coils can be slit to customers requirements on either Slitter & Oiler. An oiler applies a protective coating to the strip. This process has insignificant emissions.

Emission Source/Control: 77380 - Process

Emission Source/Control: 77390 - Process

**Item 34.19(From Mod 0):**

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

Emission Unit: 2-00007

Process: 340

Source Classification Code: 5-03-007-02

Process Description:

Chemical Reaction - Acidic wastewater is sent to reactor B where it is mixed with a lime slurry to adjust pH. From the reactor it goes to the thickener where it is combined with the oily waste water stream. Oily wastewater is filtered and sent to the thickener. The back wash from the oily water filters is sent to an oil skimming step where waste oil is recovered.

Emission Source/Control: 77470 - Process

Emission Source/Control: 78170 - Process

**Item 34.20(From Mod 0):**

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

Emission Unit: 2-00007

Process: 350

Source Classification Code: 5-03-008-99

Process Description:

Filtration - The thickener overflow discharges to a filter system before being discharged to Smokes Creek. This process has insignificant emissions.

Emission Source/Control: 78180 - Process

Emission Source/Control: 78190 - Process

**Item 34.21(From Mod 0):**

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

Emission Unit: 2-00007



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Process: 360

Source Classification Code: 5-03-008-99

**Process Description:**

Holding - Various waste streams are held for further processing or shipment in the following areas: scale pit, galvanize mill waste pit, and spent pickle liquor tank. This also includes spent pickle liquor loadout. This process has insignificant emissions.

Emission Source/Control: 77250 - Process

Emission Source/Control: 77670 - Process

Emission Source/Control: 77680 - Process

**Condition 35: Applicability statement - including Subpart A General Provisions  
Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1155, Subpart CCC**

**Item 35.1:**

This Condition applies to Emission Unit: 2-00001

**Item 35.2:**

Owners or operators of affected sources subject to 40CFR63 Subpart CCC must also comply with the requirements of 40CFR63 Subpart A, according to the applicability of Subpart A to such sources, as identified in Table 1 of Subpart CCC. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, record keeping, reporting, and control devices that may apply to the source.

**Condition 36: Operational and equipment standards for hydrochloric acid storage vessels  
Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1159, Subpart CCC**

**Item 36.1:**

This Condition applies to Emission Unit: 2-00001

**Item 36.2:**

The owner or operator of an affected vessel shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.

**Condition 37: Compliance dates for existing steel pickling facilities  
Effective between the dates of 05/30/2007 and 05/29/2012**

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**Applicable Federal Requirement: 40CFR 63.1160(a), Subpart CCC**

**Item 37.1:**

This Condition applies to Emission Unit: 2-00001

**Item 37.2:**

The owner or operator of an affected existing pickling facility subject to 40CFR63 Subpart CCC shall achieve initial compliance with the requirements of Subpart CCC no later than June 22, 2001.

**Condition 38: Maintenance requirements**

**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1160(b), Subpart CCC**

**Item 38.1:**

This Condition applies to Emission Unit: 2-00001

**Item 38.2:**

The owner or operator of an affected source shall comply with the operation and maintenance requirements prescribed under §63.6(e) of subpart A of this part. Additionally, the owner or operator shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

- (i) Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
- (ii) Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
- (iii) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;
- (iv) Require an inspection of each scrubber at intervals of no less than 3 months with:
  - (A) Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
  - (B) Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
  - (C) Repair or replacement of droplet eliminator elements as needed;
  - (D) Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
  - (E) Adjustment of damper settings for consistency with the required air flow.
- (v) If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.
- (vi) The owner or operator shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of this subpart.



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(vii) The owner or operator shall maintain a record of each inspection, including each item identified in paragraph (b)(2)(iv) of this section, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

**Condition 1-1: Compliance Certification**

**Effective between the dates of 07/25/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1161(a), Subpart CCC**

**Item 1-1.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 1-1.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator will conduct an initial performance test no later than December 22, 2001, for each process or emission control device to determine and demonstrate compliance with either the applicable collection efficiency standard or the applicable emission concentration standard according to the requirements in Section 63.7 of Subpart A and in Section 63.1161(a)(1) - (3) & (d) of Subpart CCC. Subsequent performance tests will be conducted annually (or according to an alternative schedule that is approved by the Regional Air Pollution Control Engineer, but no less frequently than every 2 1/2 years or twice per Title V permit term) within the same calendar year quarter as the initial performance test. A performance test sampling protocol which meets the requirements of Section 63.7(c) of Subpart A will be submitted to the Regional Air Pollution Control Engineer at least 60 days prior to sampling for Department review and approval. As required by Sec. 63.9(e) of subpart A of this part, the owner or operator of an affected source will notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow the Administrator to review and approve the site-specific test plan required under Sec. 63.7(c) of



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subpart A of this part and, if requested by the Administrator, to have an observer present during the test.

Parameter Monitored: HYDROGEN CHLORIDE

Upper Permit Limit: 18 parts per million (by volume)

Reference Test Method: EPA Method 26A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 39: Compliance Certification**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1161(a), Subpart CCC**

**Item 39.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator will conduct an initial performance test no later than December 22, 2001, for each process or emission control device to determine and demonstrate compliance with either the applicable collection efficiency standard or the applicable emission concentration standard according to the requirements in Section 63.7 of Subpart A and in Section 63.1161(a)(1) - (3) & (d) of Subpart CCC. CCC. Subsequent performance tests will be conducted annually (or according to an alternative schedule that is approved by the Regional Air Pollution Control Engineer, but no less frequently than every 2 1/2 years or twice per Title V permit term) within the same calendar year quarter as the initial performance test. A performance test sampling protocol which meets the requirements of Section 63.7(c) of Subpart A will be submitted to the Regional Air Pollution Control Engineer



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at least 60 days prior to sampling for Department review and approval. As required by Sec. 63.9(e) of subpart A of this part, the owner or operator of an affected source will notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow the Administrator to review and approve the site-specific test plan required under Sec. 63.7(c) of subpart A of this part and, if requested by the Administrator, to have an observer present during the test.

Parameter Monitored: HYDROGEN CHLORIDE

Lower Permit Limit: 97 percent reduction by weight

Reference Test Method: EPA Method 26A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 40: Establishment of scrubber operating parameters  
Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1161(b), Subpart CCC**

**Item 40.1:**

This Condition applies to Emission Unit: 2-00001

**Item 40.2:**

During the performance test for each emission control device, the owner or operator using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation, the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The owner or operator shall determine the operating parameter monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per Section 63.1161(a)(2) of Subpart CCC. An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

**Condition 41: Compliance Certification  
Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1162(a)(2), Subpart CCC**



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**Facility DEC ID: 9149900067**

**Item 41.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 41.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator will install, operate, and maintain systems for the measurement and recording of the scrubber makeup water flow rate. This flow rate must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate less than the minimum value established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in §63.1160(b)(2) of this subpart. Failure to record the scrubber makeup water flow rate is a violation of the monitoring requirements of this subpart.

Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.

The owner or operator may develop and implement alternative monitoring requirements subject to approval by the Administrator.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 42: Compliance Certification**

**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1162(c), Subpart CCC**

**Item 42.1:**

The Compliance Certification activity will be performed for:



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Emission Unit: 2-00001

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 owner or operator of the affected hydrochloric acid storage vessel will inspect each vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 43: Request for extension of compliance**

**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1163(b), Subpart CCC**

**Item 43.1:**

This Condition applies to Emission Unit: 2-00001

**Item 43.2:**

As required by §63.9(c) of subpart A of this part, if the owner or operator of an affected source cannot comply with this standard by the applicable compliance date for that source, or if the owner or operator has installed BACT or technology to meet LAER consistent with §63.6(i)(5) of subpart A of this part, he/she may submit to the Regional Air Pollution Control Engineer a request for an extension of compliance as specified in §63.6(i)(4) through 63.6(i)(6) of subpart A of this part.

**Condition 44: Compliance Certification**

**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 40CFR 63.1165, Subpart CCC**

**Item 44.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

**Item 44.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- (a) General record keeping requirements: As required by §63.10(b)(2) of subpart A of this part, the owner or operator shall maintain records for 5 years from the date of each record of:
- (1) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment) as defined in the facility's startup, shutdown, & malfunction plan (SSMP);
  - (2) The occurrence and duration of each malfunction of the air pollution control equipment;
  - (3) All maintenance performed on the air pollution control equipment per the operation and maintenance plan required by §63.1160(b) of subpart CCC of this part;
  - (4) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
  - (5) All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see §63.10(b)(2)(v) of subpart A of this part);
  - (6) All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
  - (7) All results of initial or subsequent performance tests;
  - (8) If the owner or operator has been granted a waiver from record keeping or reporting requirements under §63.10(f) of subpart A of this part, any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;

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(9) If the owner or operator has been granted a waiver from the initial performance test under §63.7(h) of subpart A of this part, a copy of the full request and the Administrator's approval or disapproval;

(10) All documentation supporting initial notifications and notifications of compliance status required by §63.9 of subpart A of this part; and

(11) Records of any applicability determination, including supporting analyses.

(b) Subpart CCC records:

(1) In addition to the general records required by paragraph (a) of this condition, the owner or operator shall maintain records for 5 years from the date of each record of:

(i) Scrubber makeup water flow rate;

(ii) Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and

(iii) Each maintenance inspection and repair, replacement, or other corrective action.

(2) The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator or the Department for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Administrator or the Department for a period of 5 years after each revision to the plan.

(c) General records and subpart CCC records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 45: Compliance Certification**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 6NYCRR 212.3(a)**



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**Item 45.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Process: 130

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 45.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A computerized maintenance system is used to keep the pickle line scrubber in optimum working order. This system includes regular inspection and maintenance on the scrubber's spray nozzles, pipes, shafts, belts, pulleys and fan bearings.

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 7/30/2007.

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

**Condition 46: Compliance Certification**

**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 46.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Process: 130

**Item 46.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A performance test was completed confirming that this process complies with 6 NYCRR Part 212.6(a) when operating



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the control equipment. A computerized maintenance system is used to keep the pickle line scrubber in optimum working order. ISG Lackawanna shall observe the stack on a monthly basis and note in a log book whether or not any opacity was observed. If opacity is observed, the cause of the opacity shall immediately be identified and repaired or the process shall be shut down until repairs are completed. Each observation of opacity above zero percent and the associated repairs shall be noted in the log book. The Department reserves the right to require or conduct an EPA Method 9 opacity test.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Monitoring Frequency: MONTHLY  
Averaging Method: 6 MINUTE AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2007.  
Subsequent reports are due every 6 calendar month(s).

**Condition 47: Emissions from existing sources**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable Federal Requirement: 6NYCRR 212.3(a)**

**Item 47.1:**

This Condition applies to Emission Unit: 2-00001 Emission Point: 52203

**Item 47.2:**

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

**Condition 48: Compliance Certification**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 48.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002

**Item 48.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL



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**Permit ID: 9-1499-00067/00012**

**Facility DEC ID: 9149900067**

**DEVICE PARAMETERS AS SURROGATE**

**Monitoring Description:**

ISG Lackawanna shall observe the roof monitor on a monthly basis and note in a log book whether or not any opacity was observed. If opacity is observed, the cause of the opacity shall immediately be identified and repaired or the process shall be shut down until repairs are completed. Each observation of opacity above zero percent and the associated repairs shall be noted in the log book. The Department reserves the right to require or conduct an EPA Method 9 opacity test.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: MONTHLY

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 49: Compliance Certification**

**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005

Process: 270

**Item 49.2:**

Compliance Certification shall include the following monitoring:

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

**Monitoring Description:**

This alternate opacity limit was proposed by Bethlehem Steel (presently ISG Lackawanna) and approved by the Department in accordance with 6 NYCRR Part 212.6(b). Other requirements to assure continuous compliance with this opacity limit are included in this permit for continuous operation of the flux wiping fan during operation, scrubber water flow and pressure drop limits, and monthly opacity readings.



**New York State Department of Environmental Conservation**

**Permit ID: 9-1499-00067/00012**

**Facility DEC ID: 9149900067**

Parameter Monitored: OPACITY  
Upper Permit Limit: 50 percent  
Reference Test Method: EPA Method 9  
Monitoring Frequency: MONTHLY  
Averaging Method: 6 MINUTE AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2007.  
Subsequent reports are due every 6 calendar month(s).

**Condition 50: Compliance Certification**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005  
Process: 270

**Item 50.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The water flow rate through the wet scrubber will be  
continuously maintained at no less than 200 gallons per  
minute.

Parameter Monitored: VOLUMETRIC FLOW RATE  
Lower Permit Limit: 200 gallons per minute  
Monitoring Frequency: DAILY  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

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

**Condition 51: Compliance Certification**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 51.1:**



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**Permit ID: 9-1499-00067/00012**

**Facility DEC ID: 9149900067**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005

Process: 270

**Item 51.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The flux wiping fan must continuously operate whenever the galvanizing process is operating. Records must be kept to verify that the fan was operated as necessary.

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 7/30/2007.

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

**Condition 52: Compliance Certification**

**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 52.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005

Process: 270

**Item 52.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The pressure drop across the wet scrubber will be continuously maintained at no less than 24 inches of water.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 24 inches of water

Monitoring Frequency: DAILY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME



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**Facility DEC ID: 9149900067**

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

**Condition 53: Compliance Certification**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 53.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005    Emission Point: 68301  
Process: 250

**Item 53.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A performance test was completed confirming that this process complies with 6 NYCRR Part 212.6(a) when operating the control equipment. A computerized maintenance system is used to keep the cleaning/pickling scrubber in optimum working order. ISG Lackawanna shall observe the stack on a monthly basis and note in a log book whether or not any opacity was observed. If opacity is observed, the cause of the opacity shall immediately be identified and repaired or the process shall be shut down until repairs are completed. Each observation of opacity above zero percent and the associated repairs shall be noted in the log book. The Department reserves the right to require or conduct an EPA Method 9 opacity test.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Monitoring Frequency: MONTHLY  
Averaging Method: 6 MINUTE AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2007.  
Subsequent reports are due every 6 calendar month(s).

**Condition 54: Compliance Certification**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

**New York State Department of Environmental Conservation**

**Permit ID: 9-1499-00067/00012**

**Facility DEC ID: 9149900067**



**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 54.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005    Emission Point: 68301  
Process: 270

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

**Item 54.2:**

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. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 55: Compliance Certification**

**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 55.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005    Emission Point: 68304  
Process: 260

**Item 55.2:**



Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This furnace will fire natural gas only to ensure compliance with this requirement. ISG Lackawanna shall observe the stack on a monthly basis and note in a log book whether or not any opacity was observed. If opacity is observed, the cause of the opacity shall immediately be identified and repaired or the process shall be shut down until repairs are completed. Each observation of opacity above zero percent and the associated repairs shall be noted in the log book. The Department reserves the right to require or conduct an EPA Method 9 opacity test.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: MONTHLY

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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



**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 56: Contaminant List  
Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 56.1:**

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



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

CAS No: 007647-01-0

Name: HYDROGEN CHLORIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

**Condition 57: Unavoidable noncompliance and violations**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

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

**Item 57.1:**

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.



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(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 58: Air pollution prohibited**  
**Effective between the dates of 05/30/2007 and 05/29/2012**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 58.1:**

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.