



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Title V Facility Permit
Permit ID: 9-2911-00038/00047
Effective Date: 04/05/2000 Expiration Date: 04/05/2005

Permit Issued To: SGL CARBON LLC
6200 NIAGARA FALLS BLVD
NIAGARA FALLS, NY 14302-0667

Contact: PAUL KWAPISZESKI
SGL CARBON CORPORATION
6200 NIAGARA FALLS BLVD
NIAGARA FALLS, NY 14304-0667
(716) 236-2821

Facility: SGL CARBON LLC
6200 NIAGARA FALLS BOULEVARD
NIAGARA FALLS, NY 14304-0667

Description: SGL Carbon Corporation
Title V Permit
Site Description

SGL Carbon's Niagara Falls, NY plant manufactures specialty carbon/graphite parts. The facility operates mills, mixers, extruders, sagger baking furnaces, graphite furnaces, and a pitch impregnation department. Also included in the facility's operations are sand-cooling units, material handling and storage operations as well as product development/research and development activities. There are eight production emission units at the plant in addition to process heating operations.

Emission Unit 01 is comprised of the mill, mix, and extrude operations. Raw material such as coke and pitch is unloaded, weighed, stored, milled, mixed, cooled, and extruded into product carbon forms. The following emission points (EPs) are associated with emission unit 01: EPs 12, 14, 15, 24, 25 and 33 discharge particulate emissions which are environmentally controlled by fabric collectors, EP 26 which does not have environmental control for mixing carbon particules and pitch binder into a plastic consistency in a steam jacketed rotary mixer, and EP 31 and 32 which maintain settling chambers for environmental control of particulates.

Emission Unit 02 is comprised of the bake/rebake operations. There are two processes associated with emission unit 02; baking (201) and material handling (202). Extruded carbon shapes (green forms) are surrounded by packing media of sand and coke and are baked at high temperature to remove volatile organic compounds (VOCs). Emission points 1, 23402, 24109 and 24110 are baking furnaces controlled by thermal oxidizers; EPs 18, 19 and 20 are roof monitors; and EP 11A, 13 and 24101 are material handling operations with particulate emissions controlled by fabric filters.

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Emission Unit 03 is the pitch impregnation department wherein carbon baked shapes are impregnated with pitch and a No Oxidation solution using two autoclaves. EPs 4, 23, 28, 29 and 34 have VOCs controlled by water spray cooling or water flooding of autoclaves and by use of water-cooled condensers and/or knockout pots installed on pitch melter vent systems.

Emission Unit 04 is the graphitizing operation with two associated processes: graphitizing (401) and material handling (402). In emission unit 04, baked carbon shapes are placed between two brick head walls of a graphite furnace and surrounded by a conducting medium of coke and an outer insulating medium of coke, sand and sawdust. The furnaces, EPs 16 and 17, are electrically heated to approximately 3,000 degrees centigrade to transform the carbon from an amorphous to a crystalline structure. Material handling EPs 5 and 8 are controlled by fabric collectors.

Emission Unit 05 is the production/product development operation. An impregnation process and bake furnaces are used to bake carboneous materials and cure impregnated materials. EP 10107 is to be controlled by a thermal oxidizer.

Emission Unit 06 is comprised of the isostatic capacity expansion operations wherein specialty carbon shapes are formed under constant pressure and then baked in kilns and graphitized in electrical induction furnaces. EP 10201 is equipped with a fabric filter on a carbon billet surface grinding operation utilized to remove the "skin" from billets prior to the impregnation process. EP 70006 is comprised of a Mixer (M-01) and Mix Cooler (MC-01) with a venturi scrubber. EP 70012, 70013, 70014 and 70015 are equipped with fabric collectors on material handling operations. Bake kilns EPs 70001, 70002, (and permitted EPs 70016 and 70017 to be constructed) are/(will be) equipped with afterburners to control VOC emissions. Induction furnaces EPs 70007, 70008, 70009, 70018, (and permitted EP 70019 to be constructed) are/(will be) permitted with small flares to control trace VOC emissions.

Emission Unit 07 is the bulk carbon scrap recycling department. Bulk carbon scrap is crushed, milled, conveyed, and transferred to produce several of the basic ingredients for an extruded carbon form. Particulate emissions from these operations are collected by a fabric filter at EP 21.

Emission Unit 08 is the machining finishing operation wherein carbon shapes are machined, bored, milled and cut to specifications. Baked and graphitized stock is also sent through a cleaning machine where automatic brushing removes a light residue of packing media. Particulate emissions are collected from these operations by fabric filters installed on EPs 6A, 10, 22 and 801.

The facility operation is permitted primarily under the following regulations:

- 1) 6NYCRR Part 201-6 - requires the facility to obtain a Title V operating permit.
- 2) 6NYCRR Part 212 - requires general process emission sources such as raw material handling operations, bake and rebake furnaces, pitch impregnation, carbon scrap recycling, and machining and finishing operations to install air emission control devices.
- 3) 6NYCRR Part 229 - requires environmental control in liquid pitch storage.

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By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: DAVID S. DENK
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other 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, agents, and assigns for all claims, suits, actions, damages, and costs of every name and description, arising out of or resulting from the permittee's undertaking of activities or operation and maintenance of the facility or facilities authorized by the permit in compliance or non-compliance with the terms and conditions of the permit.

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 and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9
HEADQUARTERS



DEC GENERAL CONDITIONS

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

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 and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

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.

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

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for

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modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

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

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



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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Authorized Activity By Standard Industrial Classification Code:
3624 - CARBON AND GRAPHITE PRODUCTS

Permit Effective Date: 04/05/2000

Permit Expiration Date: 04/05/2005



LIST OF CONDITIONS

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- 41 Compliance Certification (EU=0-00001,EP=00033,Proc=101,ES=00033)
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- 44 Compliance Certification (EU=0-00002,Proc=201)
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- 46 Compliance Certification (EU=0-00002,EP=00013,Proc=202,ES=00013)
- 47 Compliance Certification (EU=0-00003,EP=00004,Proc=301,ES=00004)
- 48 Compliance Certification (EU=0-00003,EP=00023,Proc=301,ES=00023)
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- 64 Compliance Certification (EU=0-00008,Proc=801)
- 65 Compliance Certification (EU=0-00008,EP=0006A,Proc=801,ES=0006A)
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FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 1: Sealing

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(a) The commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the commissioner issued in the case of the violation. Sealing means labelling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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

Condition 3: Maintenance of equipment

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

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.



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Condition 4: Unpermitted Emission Sources
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 4.1:

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

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

Condition 5: Unavoidable Noncompliance and Violations
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-1.4

Item 5.1:

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 or certificate issued for the corresponding air contamination source. 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.



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

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

Condition 6: Emergency Defense
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 6.1:

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.

Condition 7: Recycling and Salvage
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-1.7



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Item 7.1:

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 6 NYCRR.

Condition 8: Prohibition of Reintroduction of Collected Contaminants to the Air

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 8.1:

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 9: Public Access to Recordkeeping for Title V facilities

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-1.10(b)

Item 9.1:

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

Condition 10: Proof of Eligibility

Effective between the dates of 04/05/2000 and 04/05/2005

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

Item 10.1:

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

Condition 11: Proof of Eligibility

Effective between the dates of 04/05/2000 and 04/05/2005

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

Item 11.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part



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

Condition 12: Applicable Criteria, Limits, Terms, Conditions and Standards
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 12.1:

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

- i. Any reporting requirements and operations under an accidental release plan, response plan, and compliance plan as approved as of the date of the permit issuance, or
- ii. Any support documents submitted as a part of the permit application for this facility as accepted and approved as of the date of permit issuance.

Any noncompliance with the federally-enforceable portions of this permit constitutes a violation of the federal Clean Air Act and will be grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

Item 12.2:

Any document, including reports, required by the federally-enforceable portions of this permit shall contain a certification by the responsible official for this facility as set forth in Section 201-6.3 that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

Condition 13: Cessation or Reduction of Permitted Activity Not a Defense
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 13.1:

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

Condition 14: Compliance Requirements
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

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Item 14.1:

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 the responsible official, consistent with Section 201-6.3 of Part 201.

Item 14.2:

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

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. All compliance certifications shall be submitted to the Administrator as well as to the Department.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of the effective date of this permit.

Item 14.3:

The permittee shall comply with the approved compliance schedule for this permit if such a schedule is a part of this permit. Risk management plans must be submitted to the Administrator if required by Section 112(r) of the Clean Air Act for this facility.

Item 14.4:



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Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually from the effective date of this permit, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. 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 15: Federally-Enforceable Requirements
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 15.1:

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.

Condition 16: Fees
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 16.1:

The permittee shall pay the required fees associated with this permit.

Condition 17: Monitoring, Related Recordkeeping and Reporting Requirements
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 17.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, 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.

Item 17.2:

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



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- i. Submit reports of any required monitoring at least every 6 months after the date of permit issuance. 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.
- ii. Report promptly (as prescribed under Section 201-1.4 of Part 201) to the Department:
 - deviations from permit requirements, including those attributable to upset conditions,
 - the probable cause of such deviations, and
 - any corrective actions or preventive measures taken.
- iii. The permittee must, in the event that emissions of air contaminants exceeding any air emission standard under 6 NYCRR Chapter III occur due to an emergency, comply with the reporting requirements of section 201-1.4 and subdivision 201-6.6(c) of 6 NYCRR Part 201 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. Facilities desiring an affirmative defense for non-compliance with any applicable requirement due to an emergency shall follow the requirements established under the general provisions of Part 201.
- iv. Where the owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, reports on equipment maintenance or start-up/shutdown for the facility need not be submitted to the commissioner's representative unless requested by the Department or required elsewhere in this permit.

Condition 18: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 18.1:

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 relieve the permittee from the requirement to comply with any condition contained in this permit.

The permittee 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. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Condition 19: Permit Shield
Effective between the dates of 04/05/2000 and 04/05/2005



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Applicable Federal Requirement: 6NYCRR 201-6.

Item 19.1:

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

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

Condition 20: Property Rights

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 20.1:

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

Condition 21: Reopening for Cause

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 21.1:

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



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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.

Item 21.2:

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.

Item 21.3:

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

Condition 22: Right to Inspect

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 22.1:

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

i. Enter upon the permittee's premises where the permitted facility 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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 23: Severability

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

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Item 23.1:

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.

Condition 24: Emission Unit Definition

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 24.1:

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

Emission Unit: 0-00001

Emission Unit Description:

EMISSION UNIT 01 IS COMPRISED OF THE MILL, MIX, AND EXTRUDE OPERATIONS LOCATED IN BUILDINGS 1, 1A, 2, 3, 4, 5, 6, 31 AND 32. RAW MATERIAL IS UNLOADED, WEIGHED, STORED, MILLED, MIXED, COOLED, AND EXTRUDED INTO PRODUCT FORM. THE FOLLOWING EMISSION POINTS ARE ASSOCIATED WITH EMISSION UNIT 01: EP12, EP14, EP15, EP24, EP25, EP26, EP31, EP32, EP33.

Building(s): 1
1A
2
3
31
32
4
5
6
MIL MX EXT

Item 24.2:

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

Emission Unit: 0-00002

Emission Unit Description:

EMISSION UNIT 02 IS COMPRISED OF THE BAKE/REBAKE OPERATIONS LOCATED IN BUILDINGS 6, 14, 34, 60, 234, 235, AND 241. THERE ARE TWO PROCESSES ASSOCIATED WITH EMISSION UNIT 02; BAKING (201) AND MATERIAL HANDLING (202). EXTRUDED SHAPES (GREEN SHAPES) AND RE-BAKES ARE BAKED IN SEVERAL BAKING FURNACES. NO OXIDATION MATERIAL IS ALSO DRIED IN SELECTED FURNACES. THESE SHAPES



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ARE SURROUNDED BY PACKING MEDIA COMPRISED OF SAND AND COKE. EMISSION POINTS ASSOCIATED WITH BAKING INCLUDE EP 1, EP 23402, EP 24109, EP 24110, EP 19, AND EP 20. WITHIN BLDG. 6 THERE IS ONE COVERED BAKING FURNACE (FURNACE 600) THAT IS USED FOR BAKING OFF CARBON MIXTURES BUILT UP ON LADLES/POTS THAT ARE RECEIVED FROM CUSTOMERS. POINT SOURCE EMISSIONS ARE DUCTED THROUGH AN IN-LINE INCINERATOR AND THEN TO EP 1. ANY FUGITIVE EMISSIONS GENERATED WOULD EXHAUST THROUGH EP 18, WHICH IS A ROOF MONITOR IN BLDG. 6. EMISSION POINTS ASSOICATED WITH MATERIAL HANDLING INCLUDE EP 11A, EP 13, AND EP 24101.

Building(s): 14
234
235
241
34
6
60
BAK M HAND
BAKE

Item 24.3:

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

Emission Unit: 0-00003

Emission Unit Description:

EMISSION UNIT 03 IS COMPRISED OF THE PITCH IMPREGNATION DEPARTMENT LOCATED IN BUILDING 224. BAKED SHAPES ARE IMPREGNATED WITH PITCH AND A NOX SOLUTION USING TWO AUTOCLAVES. A 15,000 GALLON LIQUID PITCH STORAGE TANK LOCATED OUTSIDE BUILDING 224 STORES PITCH TO BE USED IN THE IMPREGNATION PROCESS. EMISSION POINTS ASSOCIATED WITH EMISSION UNIT 03 INCLUDE EP 4, EP 23, EP 28, EP 29 AND EP 34.

Building(s): 224
PITCH IMPR

Item 24.4:

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

Emission Unit: 0-00004

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Emission Unit Description:

EMISSION UNIT 04 IS COMPRISED OF THE GRAPHITIZING OPERATIONS LOCATED IN BUILDINGS 9, 206, 207, 208, 209 AND 35. THERE ARE TWO PROCESSES ASSOCIATED WITH EMISSION UNIT 04; GRAPHITIZING (401) AND MATERIAL HANDLING (402). BAKED CARBON SHAPES ARE PLACED BETWEEN TWO BRICK HEADWALLS OF A GRAPHITE FURNACE AND SURROUNDED BY AN INNER CONDUCTING MEDIUM OF COKE AND AN OUTER INSULATING MEDIUM COMPRISED OF COKE, SAND, AND SAWDUST. THE FURNACES ARE ELECTRICALLY HEATED TO APPROXIMATELY 3000 DEGREES C TO TRANSFORM THE CARBON FROM AN AMORPHOUS TO A CRYSTALLINE STRUCTURE. EMISSION POINTS ASSOCIATED WITH GRAPHITIZING INCLUDE EP 16 AND EP 17. EMISSION POINTS ASSOCIATED WITH MATERIAL HANDLING INCLUDE EP 5 AND EP 8.

Building(s): 206
207
208
209
35
9
GRA M HAND
GRAPH

Item 24.5:

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

Emission Unit: 0-00006

Emission Unit Description:

EMISSION UNIT 06 IS COMPRISED OF THE ISOSTATIC CAPACITY EXPANSION OPERATIONS LOCATED IN BUILDINGS 700 AND 102. SPECIALTY CARBON SHAPES ARE MANUFACTURED IN THE ISOSTATIC CAPACITY EXPANSION DEPARTMENT. ALSO, A GRINDING OPERATION IS UTILIZED TO REMOVE THE "SKIN" FROM BILLETS PRIOR TO IMPREGNATION. EMISSION POINTS ASSOCIATED WITH EMISSION UNIT 06 INCLUDE EP 70001, EP 70002, EP 70006-EP 70009, EP 70012-EP 70019 AND EP 10201.

Building(s): 102
700
ISOSTATIC

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Item 24.6:

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

Emission Unit: 0-00007

Emission Unit Description:

EMISSION UNIT 07 IS COMPRISED OF THE BULK CARBON SCRAP RECYCLING OPERATIONS LOCATED IN BUILDING 14. BULK CARBON SCRAP IS CRUSHED, MILLED, CONVEYED, AND TRANSFERRED TO PRODUCE SEVERAL OF THE BASIC INGREDIENTS FOR AN EXTRUDED FORM. EMISSION POINT ASSOCIATED WITH EMISSION UNIT 07 INCLUDES EP 21.

Building(s): 14
CARB SCRAP

Item 24.7:

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

Emission Unit: 0-00008

Emission Unit Description:

EMISSION UNIT 08 IS COMPRISED OF THE MACHINING FINISHING OPERATIONS LOCATED IN BUILDINGS 7, 238 AND 239. CARBON SHAPES ARE MACHINED, BORED, MILLED, AND CUT TO SPECIFICATIONS. BAKED AND GRAPHITIZED STOCK IS ALSO SENT THROUGH A CLEANING MACHINE WHERE AUTOMATIC BRUSHING REMOVES A LIGHT RESIDUE OF PACKING MEDIA. EMISSION POINTS ASSOCIATED WITH EMISSION UNIT 08 INCLUDE EP 6A, 10, 22, AND 801.

Building(s): 238
239
7
FINISHING

Item 24.8:

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

Emission Unit: E-FAC10

Emission Unit Description:

HEATING AND PROCESS NATURAL GAS USAGE.

Condition 25: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

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



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Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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 the effective date of this permit.

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:

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270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
50 Wolf Road
Albany, NY 12233-3258

Reporting Requirements: ANNUALLY (ANNIVERSARY)
Initial Report Due: 05/04/2001 for the period 04/05/2000 through 04/04/2001

Condition 26: Required emissions tests
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 26.1:

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

Condition 27: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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 YEAR)

Reports due by April 15th for previous calendar year



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Condition 28: Recordkeeping requirements
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 28.1:

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

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

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

Condition 29: Visible emissions limited.
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 211.3

Item 29.1:

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 30: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.6

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Item 30.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

NO PERSON SHALL CAUSE OR ALLOW EMISSIONS
HAVING AN AVERAGE OPACITY DURING ANY SIX
CONSECUTIVE MINUTES OF 20 PERCENT OR
GREATER FROM ANY PROCESS EMISSION
SOURCE, EXCEPT ONLY THE EMISSION OF

6

UNCOMBINED WATER. COMPLIANCE WITH THIS



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REQUIREMENT SHALL BE DETERMINED BY THE FACILITY OWNER/OPERATOR CONDUCTING A DAILY SURVEY (NON-METHOD 9 OBSERVATION) OF VISIBLE EMISSIONS FROM THESE SOURCES. IF ANY ATYPICAL VISIBLE EMISSIONS ARE IDENTIFIED, CORRECTIVE ACTION IS REQUIRED AS APPROPRIATE FOR THE SOURCE. RECORDS OF DAILY SURVEY OF VISIBLE EMISSIONS MUST BE RETAINED FOR FIVE YEARS. THE DEPARTMENT RESERVES THE RIGHT TO PERFORM OPACITY OBSERVATIONS OR REQUIRE THE PERFORMANCE OF A METHOD 9 OPACITY EVALUATION BY FIRM REPRESENTATIVE.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 31: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 215.

Item 31.1:

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

Condition 32: Recycling and Emissions Reduction
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 32.1:

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVAC's in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR Part 82.161.



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d. Persons disposing of small appliances, MVAC's, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR Part 82.166. ("MVAC-like appliance as defined at 40 CFR Part 82.152)

e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR Part 82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR Part 82.166.

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

**Condition 33: Emission Point Definition By Emission Unit
Effective between the dates of 04/05/2000 and 04/05/2005**

Applicable Federal Requirement: 6NYCRR 201-6.

Item 33.1:

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

Emission Unit: 0-00001

Emission Point: 00012

Height (ft.): 30 Diameter (in.): 32
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 1

Emission Point: 00014

Height (ft.): 50 Diameter (in.): 10
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 1A

Emission Point: 00015

Height (ft.): 50 Diameter (in.): 18
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 1

Emission Point: 00024

Height (ft.): 23 Diameter (in.): 8

Emission Point: 00025

Height (ft.): 69 Diameter (in.): 5
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 2

Emission Point: 00026

Height (ft.): 48 Diameter (in.): 36
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 3

Emission Point: 00031

Height (ft.): 51 Diameter (in.): 30



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NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 2

Emission Point: 00032

Height (ft.): 66

Diameter (in.): 25

NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 2

Emission Point: 00033

Height (ft.): 26

Length (in.): 10

Width (in.): 10

Item 33.2:

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

Emission Unit: 0-00002

Emission Point: 00001

Height (ft.): 150

Diameter (in.): 78

NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 6

7

Emission Point: 00013

Height (ft.): 31

Length (in.): 27

Width (in.): 33

NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 34

Emission Point: 00018

Height (ft.): 45

Diameter (in.): 236

NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 6

Emission Point: 00019

Height (ft.): 45

Diameter (in.): 236

NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 14

Emission Point: 00020

Height (ft.): 45

Diameter (in.): 240

NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 234

Emission Point: 0011A

Height (ft.): 55

Diameter (in.): 45

NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 235

Emission Point: 23402

Height (ft.): 53

Diameter (in.): 36

NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 234

Emission Point: 24101

Height (ft.): 50

Diameter (in.): 36

NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 241

Emission Point: 24109



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Height (ft.): 51 Diameter (in.): 48
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 241

Emission Point: 24110
Height (ft.): 51 Diameter (in.): 48
Building: 241

Item 33.3:

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

Emission Unit: 0-00003

Emission Point: 00004
Height (ft.): 47 Diameter (in.): 24
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 224

Emission Point: 00023
Height (ft.): 40 Diameter (in.): 32
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 224

Emission Point: 00028
Height (ft.): 48 Diameter (in.): 6
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 224

Emission Point: 00029
Height (ft.): 43 Diameter (in.): 12
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 224

Emission Point: 00034
Height (ft.): 39 Diameter (in.): 13
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 224

Item 33.4:

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

Emission Unit: 0-00004

Emission Point: 00005
Height (ft.): 30 Diameter (in.): 34
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 208

Emission Point: 00008
Height (ft.): 30 Diameter (in.): 30
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 35

Emission Point: 00016
Height (ft.): 50 Diameter (in.): 240
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 208

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Emission Point: 00017
Height (ft.): 50 Diameter (in.): 240
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 9

Item 33.5:

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

Emission Unit: 0-00006

Emission Point: 10201
Height (ft.): 10 Diameter (in.): 19
NYTMN (km.): 4778.62 NYTME (km.): 174.229 Building: 102

Emission Point: 70001
Height (ft.): 65 Diameter (in.): 26
Building: 700

Emission Point: 70002
Height (ft.): 65 Diameter (in.): 26
Building: 700

Emission Point: 70006
Height (ft.): 85 Diameter (in.): 16
Building: 700

Emission Point: 70007
Height (ft.): 38 Diameter (in.): 14
Building: 700

Emission Point: 70008
Height (ft.): 38 Diameter (in.): 14
Building: 700

Emission Point: 70009
Height (ft.): 38 Diameter (in.): 14
Building: 700

Emission Point: 70012
Height (ft.): 85 Diameter (in.): 29
Building: 700

Emission Point: 70013
Height (ft.): 85 Diameter (in.): 17
Building: 700

Emission Point: 70014
Height (ft.): 85 Diameter (in.): 23



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Emission Point: 70015			Building: 700
Height (ft.): 85	Diameter (in.): 11		
			Building: 700
Emission Point: 70016			
Height (ft.): 65	Diameter (in.): 26		
			Building: 700
Emission Point: 70017			
Height (ft.): 65	Diameter (in.): 26		
			Building: 700
Emission Point: 70018			
Height (ft.): 38	Diameter (in.): 14		
			Building: 700
Emission Point: 70019			
Height (ft.): 38	Diameter (in.): 14		
			Building: 700

Item 33.6:

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

Emission Unit: 0-00007			
Emission Point: 00021			
Height (ft.): 30	Diameter (in.): 23		
NYTMN (km.): 4778.62	NYTME (km.): 174.229	Building: 14	

Item 33.7:

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

Emission Unit: 0-00008			
Emission Point: 00010			
Height (ft.): 30	Diameter (in.): 13		
Emission Point: 00022			
Height (ft.): 24	Diameter (in.): 24		
Emission Point: 0006A			
Height (ft.): 37	Diameter (in.): 26		Building: 7
Emission Point: 00801			
Height (ft.): 17	Length (in.): 24	Width (in.): 14	

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Condition 34: Process Definition By Emission Unit
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 34.1:

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

Emission Unit: 0-00001
Process: 101 Source Classification Code: 3-04-020-02
Process Description: MILL, MIX, AND EXTRUDE OPERATION.

Emission Source/Control: 00012 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00014 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00015 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00024 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00025 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00031 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00032 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00033 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00026 - Process

Item 34.2:

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

Emission Unit: 0-00002
Process: 201 Source Classification Code: 3-04-020-04
Process Description:
PROCESS 201 CONSISTS OF THE BAKING FURANCE
OPERATIONS IN THE BAKING DEPARTMENT.
EMISSION SOURCES ASSOCIATED WITH THE



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PROCESS ARE ES1, ES24109, ES24110, ES23402,
ES18, ES19, ES20.

Emission Source/Control: 00001 - Control
Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: 23402 - Control
Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: 24109 - Control
Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: 24110 - Control
Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: 00018 - Process

Emission Source/Control: 00019 - Process

Emission Source/Control: 00020 - Process

Item 34.3:

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

Emission Unit: 0-00002

Process: 202

Source Classification Code: 3-04-020-04

Process Description:

PROCESS 202 CONSISTS OF THE MATERIAL
HANDLING OPERATIONS IN THE BAKING
DEPARTMENT. EMISSION SOURCES ASSOCIATED
WITH THIS PROCESS ARE ES 11A, ES 13, AND ES
24101.

Emission Source/Control: 00013 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0011A - Control
Control Type: FABRIC FILTER

Emission Source/Control: 24101 - Control
Control Type: FABRIC FILTER

Item 34.4:

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

Emission Unit: 0-00003

Process: 301

Source Classification Code: 3-04-020-03

Process Description:



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PROCESS 301 CONSISTS OF THE PITCH
IMPREGNATION DEPARTMENT LOCATED IN BLDG
224. EMISSION SOURCES ASSOCIATED WITH THIS
PROCESS ARE ES4, ES23, ES28, ES29 AND
ES34.

Emission Source/Control: 00004 - Process

Emission Source/Control: 00023 - Process

Emission Source/Control: 00028 - Process

Emission Source/Control: 00029 - Process

Emission Source/Control: 00034 - Process

Item 34.5:

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

Emission Unit: 0-00004

Process: 401

Source Classification Code: 3-04-020-05

Process Description:

PROCESS 401 CONSISTS OF THE GRAPHITIZING
FURNACE OPERATIONS IN THE GRAPHITIZING
DEPARTMENT. EMISSION SOURCES ASSOCIATED
WITH THIS PROCESS ARE ES 16 AND ES 17.

Emission Source/Control: 00016 - Process

Emission Source/Control: 00017 - Process

Item 34.6:

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

Emission Unit: 0-00004

Process: 402

Source Classification Code: 3-04-020-05

Process Description:

PROCESS 402 CONSISTS OF THE MATERIAL
HANDLING OPERATIONS IN THE GRAPHITIZING
DEPARTMENT. EMISSION SOURCES ASSOCIATED
WITH THIS PROCESS ARE ES 5 AND ES 8.

Emission Source/Control: 00005 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00008 - Control

Control Type: FABRIC FILTER

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Item 34.7:

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

Emission Unit: 0-00006

Process: 601

Source Classification Code: 3-04-020-05

Process Description:

EMISSION UNIT 000006 IS COMPRISED OF THE ISOSTATIC CAPACITY EXPANSION IN BLDG 700 AND 102. IN PROCESS 601 SPECIALTY CARBON SHAPES ARE BAKED IN EP 70001, 70002, 70016 AND 70017. RAW MATERIALS ARE SIZED AND MIXED IN EP 70006, 70012, 70013, 70014 AND 70015. INDUCTION FURNACE GRAPHITIZING IN EP 70007, 70008, 70009, 70018 AND 70019. CARBON BILLET SURFACE GRINDING OPERATION IN EP 10201.

Emission Source/Control: 10201 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 70001 - Control

Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: 70002 - Control

Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: 70006 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 70012 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 70013 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 70014 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 70015 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 70016 - Control

Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: 70017 - Control

Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: 70007 - Process

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Emission Source/Control: 70008 - Process

Emission Source/Control: 70009 - Process

Emission Source/Control: 70018 - Process

Emission Source/Control: 70019 - Process

Item 34.8:

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

Emission Unit: 0-00007

Process: 701

Source Classification Code: 3-04-020-99

Process Description:

IN PROCESS 701 BULK CARBON SCRAP IS RECYCLED BY CRUSHING, MILLING AND CONVEYING THE MATERIAL TO PRODUCE SEVERAL OF THE BASIC INGREDIENTS FOR AN EXTRUDED FORM. EMISSION SOURCE ASSOCIATED WITH PROCESS 701 IS ES 00021.

Emission Source/Control: 00021 - Control

Control Type: FABRIC FILTER

Item 34.9:

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

Emission Unit: 0-00008

Process: 801

Source Classification Code: 3-04-020-99

Process Description:

CARBON SHAPES ARE MACHINED, BORED, MILLED AND CUT TO SPECIFICATIONS. CLEANING MACHINE (EP 00801) REMOVES A LIGHT RESIDUE OF PACKING MATERIAL FROM CARBON PRODUCT. EMISSION SOURCES ASSOCIATED WITH PROCESS 801 ARE ES 0006A, 00010, 00022 AND 00801.

Emission Source/Control: 00010 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00022 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0006A - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00801 - Control

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Control Type: FABRIC FILTER

Condition 35: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

Process: 101

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

THESE SOURCES ARE COOLERS WITH SETTLING CHAMBERS FOR CARBON MIX READY FOR EXTRUSION. SGL HAS PROVIDED POTENTIAL TO EMIT CALCULATIONS IN CORRESPONDENCE DATED OCTOBER 23, 1998, THAT PARTICULATE EMISSIONS ARE WITHIN 0.15 GR/DSCF FOR EP 00031 AND 00032 AT MAXIMUM PRODUCTION. NO CONTROLS REQUIRED FOR COAL TAR VOLATILES WITH ERP AND PTE LESS THAN ONE POUND PER HOUR FOR THESE SOURCES. SGL MUST OPERATE THESE SOURCES ACCORDING TO GOOD OPERATION AND MAINTENANCE PRACTICE (SEE "SGL CARBON CORPORATION NIAGARA FALLS OPERATIONS MANUAL-PREVENTIVE MAINTENANCE" ATTACHED 43 PAGES AS A REQUIREMENT OF THIS TITLE V PERMIT).

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 36: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

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Facility DEC ID: 9291100038



Process: 101

Regulated Contaminant:

CAS No: 065996-93-2

Name: PITCH, COAL TAR, HIGH-TEMP.

ard

Item 36.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE., DUST COLLECTOR)
IS OPERATING PROPERLY FOR EP 00024 AND
00025 (EMISSION LIMIT 0.15 GR/DSCF FOR
BOTH SOURCES) PITCH PELLETS PNEUMATICALLY
UNLOADED TO STORAGE.

NOTE: PRESSURE CHANGE DEVICE MUST BE
FUNCTIONING WHENEVER PROCESS IS IN
OPERATION. BAGHOUSE MONITORING OF
PRESSURE CHANGE MUST BE CONDUCTED ONCE
PER SHIFT BY SGL PERSONNEL WHENEVER
PROCESS IS IN OPERATION. PRESSURE DROP
LIMITS OF MONITORING ARE INTENDED TO BE
INDICATORS THAT THE GRAIN LOADING
STANDARD, EITHER 0.05 OR 0.15 GR/DSCF AS
APPROPRIATE FOR THE SOURCE, IS BEING
ACHIEVED. OPERATION OF THE BAGHOUSE
OUTSIDE OF THE LIMITS OF MONITORING SHALL
TRIGGER INVESTIGATION OF BAGHOUSE
PERFORMANCE BY APPROPRIATE SGL PERSONNEL.
RECORDS OF BAGHOUSE MONITORING MUST BE
RETAINED FOR FIVE YEARS.

THE ABOVE NOTE APPLIES ALSO TO THE
FOLLOWING CONDITIONS IN THIS PERMIT:
CONDITION 36, 37, 38, 40, 44, 45, 55, 56,
58, 61, 63, 64, 65 AND
66.

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Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 37: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001 Emission Point: 00012
Process: 101 Emission Source: 00012

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

Item 37.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:
SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE. DUST COLLECTOR) IS
OPERATING PROPERLY FOR RAW MATERIALS
STORAGE. (EMISSION LIMIT 0.05 GR/DSCF)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 38: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3



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Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001 Emission Point: 00014
Process: 101 Emission Source: 00014

Regulated Contaminant:
CAS No: 007440-44-0
Name: CARBON

Item 38.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:
SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE. DUST COLLECTOR) IS
OPERATING PROPERLY ON RAW MATERIAL
PULVERIZING OPERATION. (EMISSION LIMIT
0.15 GR/DSCF)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 39: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001 Emission Point: 00015
Process: 101 Emission Source: 00015

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

Item 39.2:

Compliance Certification shall include the following monitoring:

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Facility DEC ID: 9291100038



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

Monitoring Description:

SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE., DUST COLLECTOR)
IS OPERATING PROPERLY FOR RAW MATERIAL
(COKE, GRAPHITE, AND COAL TAR PITCH)
CRUSHING, SIZING AND STORAGE . (EMISSION
LIMIT 0.15 GR/DSCF)

Parameter Monitored: PRESSURE CHANGE

Lower Limit of Monitoring: 1 inches of water

Upper Limit of Monitoring: 8 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 40: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001 Emission Point: 00026

Process: 101 Emission Source: 00026

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

EP 00026 IS MIXER FOR CARBON PARTICLES
AND PITCH BINDER. SGL HAS PROVIDED
POTENTIAL TO EMIT CALCULATIONS IN
CORRESPONDENCE DATED OCTOBER 23, 1998,
THAT PARTICULATE EMISSIONS ARE WITHIN
0.05 GR/DSCF FOR THIS SOURCE AT MAXIMUM
PRODUCTION. ENVIRONMENTAL CONTROL IS NOT
REQUIRED FOR AROMATIC HYDROCARBON
EMISSIONS WITH ERP AND PTE LESS THAN 1.0
LBS/HR. SGL MUST OPERATE THIS SOURCE
ACCORDING TO GOOD OPERATION AND
MAINTENANCE PRACTICE (SEE ATTACHED SGL



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CARBON CORPORATION NIAGARA FALLS
OPERATIONS MANUAL-PREVENTIVE
MAINTENANCE).

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 41: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001 Emission Point: 00033
Process: 101 Emission Source: 00033

Regulated Contaminant:
CAS No: 065996-93-2
Name: PITCH, COAL TAR, HIGH-TEMP.

Item 41.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:
SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE. DUST COLLECTOR) IS
OPERATING PROPERLY ON SOLID PITCH BEING
PNEUMATICALLY CONVEYED TO BINS. (EMISSION
LIMIT 0.05 GR/DSCF)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 42: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3

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Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00002

Process: 201

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

EP 00018, 00019 AND 00020 ARE ROOF MONITORS FOR BLDG. 6, 14 AND 234, RESPECTIVELY, AND ARE UNCONTROLLED EMISSION SOURCES. SGL HAS PROVIDED POTENTIAL TO EMIT CALCULATIONS IN CORRESPONDENCE DATED OCTOBER 23, 1998, THAT PARTICULATE EMISSIONS ARE WITHIN 0.15 GR/DSCF FOR EP 00019 AND 00020 AT MAXIMUM PRODUCTION. BASED ON THE RELATIVE LOWER LEVEL OF ACTIVITY COMPARED TO EP 00019 AND EP 00020, IT IS CONCLUDED THAT PARTICULATE EMISSIONS ARE WITHIN 0.15 GR/DSCF FOR EP 00018. SGL MUST OPERATE THESE SOURCES ACCORDING TO GOOD OPERATION AND MAINTENANCE PRACTICE (SEE ATTACHED SGL CARBON CORPORATION NIAGARA FALLS OPERATIONS MANUAL-PREVENTIVE MAINTENANCE).

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 43: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00002

Process: 201

Regulated Contaminant:

CAS No: 008007-45-2

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Facility DEC ID: 9291100038



Name: COAL TAR PITCH VOLATILES (BENZENE SOL. FRACTION).

Item 43.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

THERMAL INCINERATORS MUST OPERATE AT A MINIMUM OF 700 DEGREES CELSIUS (CHAMBER) TEMPERATURE DURING THE FUMING CYCLE (BAKING FURNACE STOCK TEMPERATURE BETWEEN 250 & 600 DEG. CELSIUS DURING UPHEAT) IN ORDER TO MAINTAIN GREATER THAN 99% CONTROL FOR COAL TAR PITCH VOLATILES ('A' RATED CONTAMINANTS) ON SAGGER BAKING FURNACES EP 23402, 24109 AND 24110, ON FURNACE 600 (ES 18) IN - LINE INCINERATOR DUCTED TO EP 00001, AND MAIN STACK FOR BAKING FURNACES EP 00001. THIS REQUIREMENT SUPERCEDES 81% RACT CONTROL REQUIREMENT OF 6 NYCRR PART 212.10(c)(4)(i) FOR THESE SOURCES. IN ADDITION, THESE INCINERATORS MUST HAVE CONTINUOUS MONITORING AND DATA RECORDING OF CHAMBER GAS TEMPERATURE FOR COMPLIANCE WITH 6 NYCRR PART 212 RACT.

Parameter Monitored: TEMPERATURE

Lower Limit of Monitoring: 700 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 44: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00002

Process: 201

Item 44.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

FOR EP 23402, 24109 AND 24110, SAGGER BAKING FURNACES, SGL HAS PROVIDED POTENTIAL TO EMIT CALCULATIONS IN CORRESPONDENCE DATED OCTOBER 23, 1998, THAT PARTICULATE EMISSIONS ARE WITHIN 0.05 GR/DSCF FOR THESE SOURCES AT MAXIMUM PRODUCTION. SGL MUST OPERATE THESE SOURCES ACCORDING TO GOOD OPERATION AND MAINTENANCE PRACTICE (SEE ATTACHED SGL CARBON CORP. NIAGARA FALLS OPERATION MANUAL-PREVENTIVE MAINTENANCE).

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 45: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00002

Process: 202

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

Item 45.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

DRY PROCESS MATERIAL COMPRISED OF SAND AND COKE IS STORED AS PACKING MEDIA FOR CARBON BAKING FURNACES. SGL MUST MONITOR CONTROL DEVICE PARAMETERS AS AN INDICATOR THAT EMISSIONS CONTROL EQUIPMENT (IE., DUST COLLECTOR) IS OPERATING PROPERLY FOR EP 0011A AND 24101. (EMISSION LIMIT OF 0.05 GR/DSCF FOR BOTH SOURCES)



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Facility DEC ID: 9291100038

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 46: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00002 Emission Point: 00013
Process: 202 Emission Source: 00013

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

Item 46.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:
SAND AND COKE ARE COOLED, SCREENED AND
STORED FOR USE AS PACKING MEDIA IN THE
CARBON BAKING FURNACES. SGL MUST MONITOR
CONTROL DEVICE PARAMETERS AS AN INDICATOR
THAT EMISSIONS CONTROL EQUIPMENT (IE.,
DUST COLLECTOR) IS OPERATING PROPERLY.
(EMISSION LIMIT 0.15 GR/DSCF)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 47: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

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Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038



Applicable Federal Requirement: 6NYCRR 212.4

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003 Emission Point: 00004
Process: 301 Emission Source: 00004

Regulated Contaminant:
CAS No: 068334-31-6
Name: PETROLEUM PITCH

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

EMISSIONS FROM EP4 (60" AUTOCLAVE) ARE CONTROLLED VIA FLOODING OF THE AUTOCLAVE WITH WATER AND THE USE OF A VAPOR CONDENSOR DOWNSTREAM OF THE AUTOCLAVE. PETROLEUM PITCH EMISSIONS RESULT FROM: EXHAUST OF THE VACUUM PUMP, VENTING AIR PRESSURE FROM AUTOCLAVE TO ATMOSPHERE, AND DISPLACEMENT OF AIR WHILE FLOODING AUTOCLAVE WITH WATER DURING THE QUENCH OPERATION. ROUTINE MAINTENANCE PROCEDURES MUST BE FOLLOWED BY INSPECTING THE CONDENSOR QUARTERLY AND CLEANING, IF NECESSARY, TO MAINTAIN ITS EFFICIENCY FOR COMPLIANCE WITH PART 212. RECORDS OF INSPECTION AND CLEANING MUST BE KEPT ON SITE FOR FIVE (5) YEARS.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 48: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003 Emission Point: 00023



New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

Process: 301

Emission Source: 00023

Regulated Contaminant:

CAS No: 068334-31-6

Name: PETROLEUM PITCH

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

EMISSIONS FROM EP23 (84" AUTOCLAVE) ARE CONTROLLED VIA A WATER SPRAY COOL DOWN SYSTEM. WATER SPRAY MUST BE UTILIZED EVERY TIME THE AUTOCLAVE IS OPENED TO REDUCE PARTICULATE AND HYDROCARBON EMISSIONS. WATER SPRAY COOL DOWN SYSTEM MUST BE INSPECTED WITH ROUTINE MAINTENANCE PROCEDURES QUARTERLY TO ENSURE THAT SPRAYS ARE OPERATING PROPERLY.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 49: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003

Emission Point: 00028

Process: 301

Emission Source: 00028

Regulated Contaminant:

CAS No: 068334-31-6

Name: PETROLEUM PITCH

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A TRAP/KNOCKOUT POT IS USED TO CONTAIN EMISSIONS FROM THE VENT OF THE LIQUID



New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

PITCH STORAGE VESSEL FOR THE 84" AUTOCLAVE. THE TRAP/KNOCKPOT DRAINS TO MELTER. ROUTINE MAINTENANCE PROCEDURES MUST BE FOLLOWED BY INSPECTING THE TRAP/KNOCKOUT POT QUARTERLY AND CLEANING, IF NECESSARY, TO MAINTAIN ITS EFFICIENCY FOR COMPLIANCE WITH PART 212. RECORDS OF INSPECTION AND CLEANING MUST BE KEPT ON SITE FOR FIVE (5) YEARS.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 50: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003 Emission Point: 00029
Process: 301 Emission Source: 00029

Regulated Contaminant:
CAS No: 068334-31-6
Name: PETROLEUM PITCH

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A TRAP/KNOCKOUT POT IS USED TO CONTAIN PETROLEUM PITCH EMISSIONS FROM THE VENT OF THE LIQUID PITCH STORAGE VESSEL FOR THE 60" AUTOCLAVE. ROUTINE MAINTENANCE PROCEDURES MUST BE FOLLOWED BY INSPECTING THE TRAP/KNOCKOUT POT QUARTERLY AND CLEANING, IF NECESSARY, TO MAINTAIN ITS EFFICIENCY FOR COMPLIANCE WITH PART 212. 15,000 GAL PITCH STORAGE ALSO VENTS THRU EP 00029. SEE COMPLIANCE CERTIFICATION FOR PART 229 .3(e)(2)(iv). RECORDS OF INSPECTION AND CLEANING MUST BE KEPT ON SITE FOR FIVE (5) YEARS.



New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 51: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(iv)

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003 Emission Point: 00029
Process: 301 Emission Source: 00029

Regulated Contaminant:

CAS No: 068334-31-6

Name: PETROLEUM PITCH

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

15,000 GAL PETROLEUM PITCH STORAGE
TANK EQUIPPED WITH A VACUUM BREAK,
PRESSURE RELIEF DEVICE (SUBMERGED FILL
TECHNICALLY INFEASIBLE) AND VENTING THRU
TRAP/KNOCKOUT POT THRU EP 00029 SATISFIES
COMPLIANCE WITH PART 229. ROUTINE
MAINTENANCE PROCEDURES MUST BE FOLLOWED
BY INSPECTING THE TRAP/KNOCKOUT POT
QUARTERLY AND CLEANING, IF NECESSARY, TO
MAINTAIN THAT IT IS OPERATING PROPERLY
AND EFFICIENTLY. RECORDS OF INSPECTION
AND CLEANING MUST BE KEPT ON SITE FOR
FIVE (5) YEARS.

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 52: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 229.5(d)

Item 52.1:



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Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003 Emission Point: 00029
Process: 301 Emission Source: 00029

Regulated Contaminant:
CAS No: 068334-31-6
Name: PETROLEUM PITCH

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

SGL MUST KEEP RECORDS OF THE CAPACITY OF
THE 15,000 GALLON LIQUID PITCH STORAGE
TANK FOR A PERIOD OF FIVE YEARS.

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 53: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003 Emission Point: 00034
Process: 301 Emission Source: 00034

Regulated Contaminant:
CAS No: 068334-31-6
Name: PETROLEUM PITCH

Item 53.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

SOLID CARBON SHAPES ARE PLACED IN
PREHEATER #3 TO DRIVE OFF MOISTURE AND
HEAT THE SURFACE FOR ACCEPTING HOT
PITCH. GOOD OPERATING AND MAINTENANCE
PRACTICES ARE REQUIRED TO MINIMIZE PITCH

s20



New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

EMISSIONS WHICH ADHERE TO THE RACKS FROM PREVIOUS PROCESSING WHILE CARBON SHAPES ARE BEING HEATED PRIOR TO PLACEMENT INTO THE AUTOCLAVE .

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 54: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00004

Process: 401

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

NO MONITORING WITH RESPECT TO AIR CLEANING IS REQUIRED FOR EP 00016 AND 00017 (ACHESON GRAPHITIZING FURNACES) SINCE THESE EMISSION POINTS HAVE NO ENVIRONMENTAL CONTROL. CONSENT DECREE OF 1971 GAVE ENV. RATING OF "D" TO SOLID PARTICULATES. SGL MUST OPERATE THESE SOURCES ACCORDING TO GOOD OPERATING AND MAINTENANCE PRACTICE IN ORDER TO MINIMIZE EMISSIONS OF VOC, SOLID PARTICULATES, SO₂, CO, CO₂, AND H₂S.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 55: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038



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

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00004

Process: 401

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

Item 55.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

RACT VARIANCE LIMITS TOTAL VOC EMISSIONS TO 214.4 TONS/YR IN COMBINATION FOR EP 00016 (148.2 TONS/YR) AND EP 00017 (66.2 TONS/YR) FOR THE ACHESON GRAPHITIZING FURNACES. PRODUCTION MONITORING ON A MONTHLY BASIS WITH DEVELOPED EMISSION FACTORS IS REQUIRED TO VERIFY ANNUAL VOC TONNAGE. MAXIMUM PRODUCTION RATE IN COMBINATION FOR EP 00016 AND 00017 LIMITED TO 17,360,324 LBS STOCK/YR WITH 0.0247 LBS VOC/LB STOCK EMISSION. ANNUAL PRODUCTION AND VOC EMISSIONS MUST BE TOTALIZED ON A MONTHLY ROLLING BASIS AND RECORDS MAINTAINED ON SITE FOR FIVE (5) YEARS. ANNUAL REPORT IS REQUIRED WHICH SUMMARIZES ANNUAL PRODUCTION AND VOC EMISSIONS TOTALIZED ON A MONTHLY ROLLING BASIS AND WHICH DOCUMENTS REFORMULATION, ABATEMENT TECHNOLOGY AND PROCESS MODIFICATIONS FOR COMPLIANCE WITH THE 6 NYCRR PART 212 RACT VARIANCE FOR THIS SOURCE.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: PRODUCT

Upper Limit of Monitoring: 17,360,324 pounds

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR YEAR)

Reports due by January 30th for previous calendar year

New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038



Condition 56: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00004 Emission Point: 00005
Process: 402 Emission Source: 00005

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

Item 56.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:
SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE., DUST COLLECTOR)
IS OPERATING PROPERLY FOR COKE SCREENING,
WEIGHING, BLENDING AND STORAGE FOR
ACHESON GRAPHITE FURNACES. (EMISSION
LIMIT 0.05 GR/DSCF)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 57: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

s20 Applicable Federal Requirement: 6NYCRR 212.4

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00004 Emission Point: 00008
Process: 402 Emission Source: 00008

New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038



Regulated Contaminant:

CAS No: 007440-44-0

Name: CARBON

Item 57.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE., DUST COLLECTOR)
IS OPERATING PROPERLY ON INCOMING COKE
CRUSHING, SIZING AND STORAGE FOR ACHESON
GRAPHITE FURNACES. (EMISSION LIMIT 0.05
GR/DSCF)

Parameter Monitored: PRESSURE CHANGE

Lower Limit of Monitoring: 1 inches of water

Upper Limit of Monitoring: 8 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 58: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00006

Process: 601

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

Item 58.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038



SGL MUST MONITOR CONTROL DEVICE PARAMETER AS AN INDICATOR THAT EMISSIONS CONTROL EQUIPMENT (IE., DUST COLLECTOR) IS OPERATING PROPERLY ON EP 70012 AND 70013, MILLS FOR RAW MATERIAL SIZE REDUCTION, AND EP 70014, PRODUCT PACKED INTO BAGS, AND EP 70015, PROCESS MIX SIZE REDUCTION. (EMISSION LIMIT OF 0.05 GR/DSCF FOR THESE SOURCES)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 59: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00006
Process: 601

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

Item 59.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A STACK AFTERBURNER IS EMPLOYED TO CONTROL VOLATILE EMISSIONS FROM CARBON BAKE FURNACES DURING THE FUMING (BAKING FURNACE STOCK TEMPERATURE BETWEEN 250 & 600 DEG. CELSIUS DURING UPHEAT) CYCLE FOR EP 70001, 70002, 70016 AND 70017. MINIMUM 700 DEGREES CELSIUS CHAMBER TEMPERATURE IS REQUIRED TO DEMONSTRATE AT LEAST 99% CONTROL FOR THESE VOLATILE



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Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

EMISSIONS WHICH MAY CONTAIN "A" RATED AROMATIC HYDROCARBONS. THIS REQUIREMENT SUPERCEDES THE 81% RACT CONTROL REQUIREMENT OF 6NYCRR PART 212.10(c)(4)(i) FOR THESE EMISSION POINTS. IN ADDITION, THESE AFTERBURNERS MUST HAVE CONTINUOUS MONITORING AND DATA RECORDING OF CHAMBER GAS TEMPERATURE FOR COMPLIANCE WITH 6 NYCRR PART 212 RACT.

Parameter Monitored: TEMPERATURE

Lower Limit of Monitoring: 700 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 60: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00006

Process: 601

Item 60.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

ELECTRICAL INDUCTION GRAPHITIZING FURNACES EP 70007, 70008, 70009, 70018 (5 UNITS FOR EACH EP) AND 70019 (4 UNITS) ARE UNCONTROLLED WITH TRACE EMISSIONS OF SO₂, H₂S, CO, CARBON AND AROMATIC HYDROCARBONS FLARED AND EXHAUSTED THROUGH HOODING FOR EACH EMISSION POINT. THESE SOURCES MUST BE OPERATED WITH GOOD OPERATING AND MAINTENANCE PRACTICE IN ORDER TO MINIMIZE TRACE EMISSIONS OF THESE CONTAMINANTS.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

Condition 61: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00006 Emission Point: 10201
Process: 601 Emission Source: 10201

Regulated Contaminant:
CAS No: 007440-44-0
Name: CARBON

Item 61.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:
SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE. DUST COLLECTOR) IS
OPERATING PROPERLY ON CARBON BILLET
SURFACE GRINDING OPERATION. (EMISSION
LIMIT 0.05 GR/DSCF)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 62: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00006 Emission Point: 70006
Process: 601 Emission Source: 70006



New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

Item 62.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

CARBON BLEND IS MIXED IN MIXER M-01 AND
PASSES THROUGH DUMP VALVE TO MIX COOLER
MC-01. VENT EMISSIONS OF VOC AND
PARTICULATE ARE SCRUBBED WITH WATER SPRAY
IN SCRUBBER SC-01, GLOBAL GL-VS-16.

Parameter Monitored: PRESSURE CHANGE

Lower Limit of Monitoring: 18 inches of water

Upper Limit of Monitoring: 28 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 63: Compliance Certification

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00007 Emission Point: 00021

Process: 701 Emission Source: 00021

Regulated Contaminant:

CAS No: 007440-44-0

Name: CARBON

Item 63.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE., DUST COLLECTOR)



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Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

IS OPERATING PROPERLY ON BULK CARBON
SCRAP CRUSHING WHICH USES THE MATERIAL
AS A BASIC INGREDIENT FOR AN EXTRUDED
CARBON FORM. (EMISSION LIMIT 0.15
GR/DSCF)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 64: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00008
Process: 801

Regulated Contaminant:
CAS No: 007440-44-0
Name: CARBON

Item 64.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:
SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE., DUST COLLECTOR) IS
OPERATING PROPERLY ON FINISHING OPERATION
FOR EP 00010 AND 00022. (EMISSION LIMIT
OF 0.15 GR/DSCF FOR BOTH SOURCES)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME



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Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 65: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.3

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00008 Emission Point: 0006A
Process: 801 Emission Source: 0006A

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

Item 65.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:
SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE., DUST COLLECTOR) IS
OPERATING PROPERLY ON FINISHING
OPERATION. (EMISSION LIMIT OF 0.15
GR/DSCF)

Parameter Monitored: PRESSURE CHANGE
Lower Limit of Monitoring: 1 inches of water
Upper Limit of Monitoring: 8 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 66: Compliance Certification
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable Federal Requirement: 6NYCRR 212.4

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00008 Emission Point: 00801
Process: 801 Emission Source: 00801

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Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038



Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

Item 66.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

SGL MUST MONITOR CONTROL DEVICE
PARAMETER AS AN INDICATOR THAT EMISSIONS
CONTROL EQUIPMENT (IE.,DUST COLLECTOR) IS
OPERATING PROPERLY ON BAKED AND
GRAPHITIZED CARBON CLEANING OPERATION.
CLEANING MACHINE REMOVES RESIDUE OF
PACKING MEDIA FROM CARBON FORMS.
(EMISSION LIMIT OF 0.05 GR/DSCF)

Parameter Monitored: PRESSURE CHANGE

Lower Limit of Monitoring: 1 inches of water

Upper Limit of Monitoring: 8 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038



STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 67: General Provisions

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable State Requirement: 6NYCRR 201-5.

Item 67.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 67.2:

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.

Item 67.3:

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

Condition 68: Contaminant List

Effective between the dates of 04/05/2000 and 04/05/2005

Applicable State Requirement: 6NYCRR 201-5.3(b)

Item 68.1:

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

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

CAS No: 007440-44-0
Name: CARBON

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



New York State Department of Environmental Conservation

Permit ID: 9-2911-00038/00047

Facility DEC ID: 9291100038

CAS No: 065996-93-2

Name: PITCH, COAL TAR, HIGH-TEMP.

CAS No: 008007-45-2

Name: COAL TAR PITCH VOLATILES (BENZENE SOL. FRACTION).

Condition 69: Air pollution prohibited
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable State Requirement: 6NYCRR 211.2

Item 69.1: No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 70: Diesel truck opacity limitation
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable State Requirement: 6NYCRR 217-3.2(a)

Item 70.1:

No person who owns, operates or leases a vehicle propelled by a diesel engine or who owns, leases or occupies land and has actual or apparent dominion or control over the operation of a vehicle propelled by a diesel engine which is present on said land, shall operate said vehicle or allow or permit it to be operated, in such a manner that exhaust emissions of a shade of blue, black, or gray equal to or greater than No. 1 on the Ringelmann chart (20 percent opacity) or equivalent standard acceptable to the commissioner are produced for a continuous period of more than five seconds when the vehicle is in motion.

Condition 71: Idling of diesel trucks limited
Effective between the dates of 04/05/2000 and 04/05/2005

Applicable State Requirement: 6NYCRR 217-3.2(b)

Item 71.1:

No person who owns, operates or leases a bus or truck, the motive power for which is provided by a diesel engine or who owns, leases or occupies land and has the actual or apparent dominion or control over the operation of a bus or truck present on such land, the motive power for which said bus or truck is provided by a diesel engine, shall allow or permit the diesel engine of such bus or truck to idle for more than five consecutive minutes when the bus or truck is not in motion, except as otherwise permitted by 6 NYCRR Subpart 217-3.3.