



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-2911-00160/00075
Effective Date: 12/22/2014 Expiration Date: 12/21/2019

Permit Issued To: WASHINGTON MILLS ELECTRO MINERALS CORP
1801 BUFFALO AVE
NIAGARA FALLS, NY 14302

Facility: WASHINGTON MILLS ELECTRO MINERALS
1801 BUFFALO AVE
NIAGARA FALLS, NY 14302

Contact: KIRK HARTOG
WASHINGTON MILLS ELECTRO MINERALS
PO BOX 423
NIAGARA FALLS, NY 14302
(716) 278-6763

Description:

**Washington Mills Electro Minerals
Title V Renewal**

This permit represents a renewal of the Title V permit for the Washington Mills Electro Minerals Corporation located in Niagara Falls, New York. The facility is an abrasives materials plant involved in the production of Silicon Carbide, Specialty Abrasives, Aluminum Oxide, and various abrasive Premium products utilized by other manufacturers in the production of abrasives products. Emissions from the facility are primarily particulate matter from the mechanical processing of raw materials. These raw materials are crushed, sized and depending on the product, furnaced, and then packaged for customers.

Process Operations:

The plant includes the following areas based on the types of products to be produced: Silicon Carbide, Specialty Aluminum Oxide, and Premium products. The facility has redundant crushing, grinding, screening, and packaging operations for each separate type of material processed. However, processing of any product may occur at any plant area. Therefore, emission units are grouped by product lines identified as 00SIC, SPEC, and 0PREM.

The facility operates 33 various non-exempt fabric filter/product collectors which are used to recover product graded as fine, medium, and coarse blend for various applications. Additional contaminants emitted from furnacing operations and exempt combustion sources include nitrogen oxides (NO_x), sulfur dioxide (SO₂), and volatile organic compounds (VOC).



There are three electric arc furnaces used to produce crude premium alumina and boron carbide products. The #4 furnace was tested in March 1998 as the worst case furnace to determine potential and actual thermal NOx emissions which were calculated to be 20 and 10 tons per year respectively for all three furnaces. These furnaces are described in process EAF within emission unit OPREM.

Final products are packaged into drums, bags, or sacks for shipment to customers. Packaging equipment is enclosed and vents indoors. Associated processes are PKG and PLS within emission unit INSIG.

Applicable Requirements:

Washington Mills is a major source subject to 40 CFR Part 70 Title V permitting requirements as determined by particulate emissions in excess of the major source threshold of 100 tons per year.

Particulate matter is regulated by both 6NYCRR, Parts 212.3(b) and 212.4(c) with allowable emission limits of 0.15 gr/dscf and 0.05 gr/dscf respectively.

Compliance Monitoring:

In order to demonstrate continued compliance with 6NYCRR, Part 212, preventative maintenance and inspection procedures have been established which consist of daily inspections to record pressure readings and address deviations from normal operating ranges, daily visible emissions evaluations of emissions points, and quarterly inspections of the collectors performed by outside contractors to check the mechanical integrity of the equipment. For those collectors not equipped with pressure gauges quarterly inspections and daily visible emissions evaluations are the only methods of maintaining compliance with the particulate emission standard.

Visible emissions evaluations (VE) of all dust collectors are performed daily by facility personnel. Any VE's observed are reported to the environmental department which contacts maintenance. An inspection of the equipment is conducted to determine if there are leaks in the tube sheets or bags which will necessitate repairs by maintenance personnel or an outside contractor.

Daily pressure readings are recorded on the inspection log. Readings outside the normal operating ranges noted on the log sheet are reported to environmental. High readings result in maintenance activities to clean the bags whereas low readings require a VE evaluation and an inspection of the collector for holes or leaks. Outside contractors may be called in if necessary to assist with repairs and maintenance.

Fugitive emissions:

Raw materials are transported to the facility in trucks and rail cars which are bottom loaded in a tarped area into track hopper bins. The raw materials are then conveyed into storage silos or storage areas inside production buildings. These conveyors are, except for a short length, enclosed or run underground. Storage piles are located outside buildings 39, 86, and 88. These piles contain waste materials such as dust collector fines, metal fines from



magnetic separation, and product nuggets from furnacing, along with recyclable material from the two settling bay areas outside buildings 86 and 88. The material located outside building 86 is contained within three walls and a roof. The material outside building 88 is contained within a concrete berm with three enclosed sides and will be tarped. The material from the nugget pile is located on a concrete pad with a retaining wall and will be wet down prior to removal offsite. These piles are identified in emission unit 0INSIG.

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: LISA M CZECHOWICZ
 NYSDEC - REGION 9
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

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



DEC GENERAL CONDITIONS

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

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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

Item 4.1:

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

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

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

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

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-2911-00160/00075

Facility DEC ID: 9291100160



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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Facility: WASHINGTON MILLS ELECTRO MINERALS
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Authorized Activity By Standard Industrial Classification Code:
3291 - ABRASIVE PRODUCTS

Permit Effective Date: 12/22/2014

Permit Expiration Date: 12/21/2019



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
 - 2 6 NYCRR 201-6.4 (a) (7): Fees
 - 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
 - 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
 - 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
 - 6 6 NYCRR 201-6.4 (e): Compliance Certification
 - 7 6 NYCRR 202-2.1: Compliance Certification
 - 8 6 NYCRR 202-2.5: Recordkeeping requirements
 - 9 6 NYCRR 215.2: Open Fires - Prohibitions
 - 10 6 NYCRR 200.7: Maintenance of Equipment
 - 11 6 NYCRR 201-1.7: Recycling and Salvage
 - 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
 - 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
 - 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
 - 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
 - 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
 - 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
 - 18 6 NYCRR 202-1.1: Required Emissions Tests
 - 19 40 CFR Part 68: Accidental release provisions.
 - 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
 - 21 6 NYCRR Subpart 201-6: Emission Unit Definition
 - 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
 - 23 6 NYCRR 211.1: Air pollution prohibited
 - 24 6 NYCRR 211.1: Compliance Certification
 - 25 6 NYCRR Part 212: Compliance Certification
 - 26 6 NYCRR 212.4 (c): Compliance Certification
 - 27 6 NYCRR 212.6 (a): Compliance Certification
- #### Emission Unit Level
- 28 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
 - 29 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=0-0PREM,Proc=B4C

- 30 6 NYCRR 212.3 (b): Compliance Certification

EU=0-0PREM,Proc=EAF

- 31 6 NYCRR 212.4 (c): Compliance Certification

EU=0-0PREM,EP=08447

- 32 6 NYCRR 212.3 (b): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

New York State Department of Environmental Conservation

Permit ID: 9-2911-00160/00075

Facility DEC ID: 9291100160



- 33 ECL 19-0301: Contaminant List
- 34 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 35 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

EU=0-INSIG

- 36 6 NYCRR 211.2: Compliance Demonstration



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

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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



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

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

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

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

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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

Condition 2: Fees
Effective between the dates of 12/22/2014 and 12/21/2019

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

Item 2.1:

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

Condition 3: Recordkeeping and Reporting of Compliance Monitoring
Effective between the dates of 12/22/2014 and 12/21/2019

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



Item 3.1:

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

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

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

**Condition 4: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 12/22/2014 and 12/21/2019**

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

Item 4.1:

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

**Condition 5: Compliance Certification
Effective between the dates of 12/22/2014 and 12/21/2019**

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



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

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

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

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



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

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

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

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

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.



Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 12/22/2014 and 12/21/2019

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

New York State Department of Environmental Conservation

Permit ID: 9-2911-00160/00075

Facility DEC ID: 9291100160



The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 9 Headquarters
270 Michigan Avenue
Buffalo, NY 14203-2915

The address for the BQA is as follows:

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

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

New York State Department of Environmental Conservation

Permit ID: 9-2911-00160/00075

Facility DEC ID: 9291100160



Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements
Effective between the dates of 12/22/2014 and 12/21/2019**

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

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

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

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

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

**Condition 9: Open Fires - Prohibitions
Effective between the dates of 12/22/2014 and 12/21/2019**

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

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

Item 9.2

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

(a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.

(b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.



- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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

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

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

**Condition 10: Maintenance of Equipment
Effective between the dates of 12/22/2014 and 12/21/2019**

Applicable Federal Requirement: 6 NYCRR 200.7

Item 10.1:

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



effectively.

Condition 11: Recycling and Salvage
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 12/22/2014 and 12/21/2019

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

Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 12/22/2014 and 12/21/2019

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

Item 14.1:

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

Condition 15: Requirement to Provide Information
Effective between the dates of 12/22/2014 and 12/21/2019

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

New York State Department of Environmental Conservation

Permit ID: 9-2911-00160/00075

Facility DEC ID: 9291100160



of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 18: Required Emissions Tests
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 18.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 19: Accidental release provisions.
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:40 CFR Part 68

Item 19.1:

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

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

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

Condition 20: Recycling and Emissions Reduction
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:40CFR 82, Subpart F

Item 20.1:



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

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

Condition 21: Emission Unit Definition
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 21.1:

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

Emission Unit: 0-00SIC

Emission Unit Description:

There are three processing lines in building 200: the old line, the new line and the dry line. Each line includes a variety of grinders, mills, conveyors, elevators, and screens. Particulate emissions from these lines are controlled by 7 fabric collectors (200-1 and 200-3 thru 200-8) which are essentially product collectors. Collectors 200-1, 200-3, 200-4 and 200-7 exhaust through emission point 20062. Collectors 200-5, 200-6, and 200-8 exhaust through emission points 20072, 20071 and 20083, respectively.

Building(s): 200

Item 21.2:

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

Emission Unit: 0-0PREM

Emission Unit Description:

Three electric arc furnaces each with a dedicated fabric filter collector and emission point. Furnace 4 exhausts through collector 86-4 and emission point 08659. Furnace 5 exhausts through collector 86-5 and emission point 08667. Furnace 6 exhausts through fabric filter collector 86-6 and emission point 08666. These fabric filters collect unfused raw material powdered alumina which is fed back into the furnace. Without the recycling of this raw material, the operation would not be cost effective. The premium line includes several areas with a variety of grinders, mills, conveyors, elevators, and screens. The exhaust for the equipment is controlled by 12 fabric filter collectors (84-1, 84-2, 84-4, 84-3, 84-4, 85-P, 87-1, 87-2, 87-3, 87-4, 87-5, 87-6 & 87-7). Each collector exhausts through a dedicated stack (08441, 08445, 08403, 08447, 08595, 08701, 08702, 08703, 08704, 08705, 8706 and 08707).



The boron carbide line include a variety of grinders, mills, conveyors, elevators, and screens. Product from this line is directed to fabric filter collectors (86-E2 and 86-W1). Each collector exhausts through a dedicated stack (86E68 and 86E69, respectively).

Building(s): 84
85
86
86E
PREMIUM

Item 21.3:

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

Emission Unit: 0-INSIG

Emission Unit Description:

Equipment for packaging final product. Packaging is done at one of eight locations at the plant. Outdoor storage piles of material to be shipped off-site.

Building(s): 200
76
83
84
86
88
PACK
PILES

Item 21.4:

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

Emission Unit: 0-SPECL

Emission Unit Description:

There are three lines for producing specialty products: the primary line, the main line and regrind. Each line includes a variety of grinders, mills, conveyors, elevators and screens. These areas are controlled by 9 product/dust fabric filter collectors (83-1, 83-3, 83-4, 83-5, 83-6, 82-1, 82-2, 82-3 and 82-4). Collectors 83-1 and 83-6 exhaust through a common stack (08307). The other collectors each exhaust through a dedicated stack (08392, 08394, 08393, 08296, 08297, 08298, and 08299).

Building(s): 82
83

Condition 22: Progress Reports Due Semiannually
Effective between the dates of 12/22/2014 and 12/21/2019

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



Item 22.1:

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

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

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

Condition 23: Air pollution prohibited
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:6 NYCRR 211.1

Item 23.1:

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 24: Compliance Certification
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:6 NYCRR 211.1

Item 24.1:

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

Emission Unit: 0-INSIG
Process: PKG

Emission Unit: 0-INSIG
Process: PLS

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

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee shall develop and implement a facility-wide fugitive dust control plan. Fugitive emissions shall be minimized by implementing measures to eliminate dust from



roadways and storage piles such as application of wet suppressants, watering, speed reduction and vacuuming or sweeping, or use of wind screens and tarps as necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 25: Compliance Certification
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement: 6 NYCRR Part 212

Item 25.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00SIC

Emission Unit: 0-0PREM

Emission Unit: 0-SPECL

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility Dust Collector Inspection and Recordkeeping Plan

This inspection and recordkeeping plan sets forth operational response and maintenance procedures to ensure that the facility will remain in compliance with the monitoring requirements of the Title V permit.

Washington Mills has 33 non-exempt fabric collectors at its Niagara Falls facility. The facility has two types of collectors; baghouse units and cartridge collectors. These are used to primarily collect product which has been crushed, screened, and sized and to control particulate emissions. A maintenance and inspection procedure has been established for: (1) compliance with 6 NYCRR Part 212 and (2) preventative maintenance to ensure continual operations of the dust control equipment.



In addition, there are dust collectors and cyclones employed in a R&D capacity in buildings 83, 86 (No. 2 Furnace), and 66 which are also subject to the maintenance and inspection programs.

INSPECTIONS

1. Quarterly Inspections: At least once each quarter, each collector will receive a complete inspection. The inspection will check:

- a) Filter Media- Condition of the media (bags/cartridges), look for leaks, holes, and make certain that none are missing or have dropped.
- b) Pressure gauges- Check magnehelic or photohelic gauges and determine if the pressure drop across the media is within the upper and lower limits as outlined for each collector.
- c) Cleaning systems- Inspect the arms, eccentrics, pin bushings, drive, belts, and bearings for shaker style. Examine the timer, header, solenoids, diaphragms, blow pipes, and venturiis for pulse air type of collectors.
- d) Dust handling Systems- Evaluate the dust handling system (rotary valve, screw conveyor, or pneumatic conveyors) for effectiveness at removing dust from the hopper.
- e) Housing/Ducting- Inspect the dampers, ducting, door seals, clean and dirty sides of the collector, look at the tube sheet and ensure that the hopper has been emptied.
- f) Fan- Visual inspection of the fan housing and check for cracks or damage, check fan belts, bearings, material build-up, corrosion and note whether there are any fan vibration problems.

A maintenance work order will be issued and repairs made for any problems noted during the inspection.

WEEKLY

1.) Confirmation that the baghouse dust is being removed from the baghouse hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms;



2.) Check of the compressed air supply for pulse-jet baghouses

DAILY INSPECTIONS

1.) Each day of operation, the operator will inspect and record the pressure readings from the differential pressure gauges (magnehelic, photohelic, and manometers) on the inspection log provided for each unit. Steps will be taken to address any readings that are found outside the range established for each collector. These ranges may change based on engineering changes or bag/cartridge changes. At the time of each change, the new range will be entered on the inspection sheet noting the reason for the change. The inspector will be kept abreast of any operational limit changes.

2.) Each day supervisors, foremen, and superintendents have been instructed to examine the stacks of all collectors and report any visible emissions immediately to the environmental department.

As part of this maintenance plan, the permittee must develop and implement corrective action procedures to be followed in the case of the observation of visible emissions from the baghouse, or the indication through the periodic baghouse system inspections that the system is not operating properly. The permittee must initiate corrective action as soon as practicable after the occurrence of the observation or event indicating a problem. In the event of malfunctions in the process or dust collector system which result in an excess emissions event, the facility is required to immediately shut down the affected furnace and notify this Department within 2 hours of the occurrence. A written explanation is to follow within 14 days of the event.

Records of quarterly inspections are to be maintained in a log book and are to include dates of inspections, pressure drop readings, calibrations, control equipment maintenance and conditions requiring corrective actions along with completion dates of the corrective actions taken. These records and other data recorded during inspections shall be retained in company files for a period of not less than five years and shall be made available to Department representatives for review during normal business hours.

All deviations from normal operating ranges, malfunctions, and corrective action are to be noted and included in an annual report submitted to the NYSDEC Region 9 office



under a truthfulness and accuracy statement.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 26: Compliance Certification
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 26.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00SIC

Emission Unit: 0-0PREM

Emission Unit: 0-SPECL

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 26.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

For each emission point associated with this emission unit (and constructed after July 1, 1973), no person shall cause or allow emissions of solid particulates to exceed 0.05 grains per dry standard cubic foot of exhaust gas.

For each fabric filter collector equipped with a pressure gauge, the pressure drop across the device will be monitored and recorded on a daily basis. Values outside the normal operating ranges established each time the bags are replaced will require that corrective maintenance procedures as described in the Facility Inspection & Maintenance Plan be implemented in order to maintain compliance with the particulate emission limit.



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 uncombined water.

The permittee shall perform daily checks, when processes are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving these emission sources. The presence or absence of any visible emissions shall be noted in an operations log.

Any visible emissions observed shall be addressed as per the procedures established in the Facility Dust Collector Inspection and Recordkeeping Plan as described in this permit.

Method 9 opacity observations may be required at the discretion of the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Method 9
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 6 calendar month(s).

**** Emission Unit Level ****

**Condition 28: Emission Point Definition By Emission Unit
Effective between the dates of 12/22/2014 and 12/21/2019**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 28.1:

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

Emission Unit: 0-00SIC

Emission Point: 20062

Height (ft.): 112

Diameter (in.): 60

NYTMN (km.): 4777.656

NYTME (km.): 171.41

Building: 200

Emission Point: 20071

Height (ft.): 2 Diameter (in.): 24



NYTMN (km.): 4777.653 NYTME (km.): 171.373 Building: 200
 Emission Point: 20072
 Height (ft.): 20 Diameter (in.): 24
 NYTMN (km.): 4777.635 NYTME (km.): 171.411 Building: 200
 Emission Point: 20083
 Height (ft.): 24 Diameter (in.): 30
 NYTMN (km.): 4777.656 NYTME (km.): 171.448 Building: 200

Item 28.2:

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

Emission Unit: 0-0PREM
 Emission Point: 08403
 Height (ft.): 55 Diameter (in.): 8
 NYTMN (km.): 4777.9 NYTME (km.): 171.4 Building: 84
 Emission Point: 08441
 Height (ft.): 74 Length (in.): 20 Width (in.): 24
 NYTMN (km.): 4777.571 NYTME (km.): 171.299 Building: 84
 Emission Point: 08445
 Height (ft.): 74 Length (in.): 33 Width (in.): 45
 NYTMN (km.): 4777.558 NYTME (km.): 171.299 Building: 84
 Emission Point: 08447
 Height (ft.): 70 Diameter (in.): 31
 NYTMN (km.): 4777.573 NYTME (km.): 171.272 Building: 84
 Emission Point: 08595
 Height (ft.): 18 Diameter (in.): 15
 NYTMN (km.): 4777.55 NYTME (km.): 171.284 Building: 85
 Emission Point: 08659
 Height (ft.): 50 Length (in.): 36 Width (in.): 36
 NYTMN (km.): 4777.506 NYTME (km.): 171.271 Building: 86
 Emission Point: 08666
 Height (ft.): 10 Diameter (in.): 56
 NYTMN (km.): 4777.512 NYTME (km.): 171.231 Building: 86
 Emission Point: 08667
 Height (ft.): 50 Length (in.): 28 Width (in.): 32
 NYTMN (km.): 4777.518 NYTME (km.): 171.27 Building: 86
 Emission Point: 08701
 Height (ft.): 41 Diameter (in.): 12
 NYTMN (km.): 4777.678 NYTME (km.): 171.405 Building: 84
 Emission Point: 08702



Height (ft.): 40 NYTMN (km.): 4777.9	Diameter (in.): 8 NYTME (km.): 171.6	Building: 84
Emission Point: 08703 Height (ft.): 40 NYTMN (km.): 4777.9	Diameter (in.): 8 NYTME (km.): 171.6	Building: 84
Emission Point: 08704 Height (ft.): 40 NYTMN (km.): 4777.9	Diameter (in.): 8 NYTME (km.): 171.6	Building: 84
Emission Point: 08705 Height (ft.): 43 NYTMN (km.): 4777.9	Diameter (in.): 8 NYTME (km.): 171.7	Building: 84
Emission Point: 08706 Height (ft.): 57 NYTMN (km.): 4777.9	Diameter (in.): 8 NYTME (km.): 171.6	Building: 84
Emission Point: 08707 Height (ft.): 56 NYTMN (km.): 4777.678	Length (in.): 20 NYTME (km.): 171.405	Width (in.): 20 Building: 84
Emission Point: 86E68 Height (ft.): 55 NYTMN (km.): 4777.52	Length (in.): 14 NYTME (km.): 171.629	Width (in.): 16 Building: 86E
Emission Point: 86E69 Height (ft.): 65 NYTMN (km.): 4777.52	Diameter (in.): 20 NYTME (km.): 171.629	Building: 86E

Item 28.3:

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

Emission Unit: 0-SPECL		
Emission Point: 08296 Height (ft.): 12 NYTMN (km.): 4777.539	Length (in.): 10 NYTME (km.): 171.451	Width (in.): 7 Building: 82
Emission Point: 08297 Height (ft.): 12 NYTMN (km.): 4777.538	Length (in.): 10 NYTME (km.): 171.438	Width (in.): 7 Building: 82
Emission Point: 08298 Height (ft.): 12 NYTMN (km.): 4777.539	Length (in.): 10 NYTME (km.): 171.426	Width (in.): 7 Building: 82
Emission Point: 08299 Height (ft.): 54 NYTMN (km.): 4777.539	Length (in.): 10 NYTME (km.): 171.414	Width (in.): 7 Building: 82



Emission Point: 08307
Height (ft.): 19 Length (in.): 23 Width (in.): 23
NYTMN (km.): 4777.577 NYTME (km.): 171.349 Building: 83

Emission Point: 08392
Height (ft.): 51 Length (in.): 17 Width (in.): 16
NYTMN (km.): 4777.576 NYTME (km.): 171.349 Building: 83

Emission Point: 08393
Height (ft.): 87 Length (in.): 16 Width (in.): 14
NYTMN (km.): 4777.577 NYTME (km.): 171.359 Building: 83

Emission Point: 08394
Height (ft.): 87 Length (in.): 16 Width (in.): 14
NYTMN (km.): 4777.564 NYTME (km.): 171.346 Building: 83

Condition 29: Process Definition By Emission Unit
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 29.1:

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

Emission Unit: 0-00SIC
Process: SIC Source Classification Code: 3-05-035-03
Process Description:

Silicon carbide - silicon carbide is the principle product processed in this area. Occasionally other materials may also be processed. Crude silicon carbide arrives at the site by rail car, truck, ocean freight container, or supersack. It is unloaded into a track-hopper, and moved by conveyors and elevators into storage silos until needed. There are three fully enclosed lines in the silicon carbide area; the old line, the new line and the dry line. Each line operates on a semi-continuous basis. Crude silicon carbide is crushed and graded using various mills and screens. Non-specification material is recycled back into the process for further crushing and screening. Magnetic separation removes impurities acquired during processing. Some products receive further treatment in the specialty treatment area. The final product is sifted into various grit sizes for packaging.

Emission Source/Control: 02001 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 02003 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 02004 - Control



Control Type: FABRIC FILTER

Emission Source/Control: 02005 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 02006 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 02007 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 02008 - Control
Control Type: FABRIC FILTER

Emission Source/Control: DRYLN - Process

Emission Source/Control: NEWLN - Process

Emission Source/Control: OLDLN - Process

Item 29.2:

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

Emission Unit: 0-OPREM

Process: B4C

Source Classification Code: 3-05-035-02

Process Description:

Crude boron carbide from the furnaces is broken into large chunks by hand with unfused material being sent back to the furnace. Acceptable material is crushed and graded using various mills and screens. Material that does not meet specifications is recycled back into the process for further crushing and screening. Magnetic separation removes impurities acquired during processing. The final product is sifted into various grit sizes for packaging.

Emission Source/Control: 086E2 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 086W1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00B4C - Process

Item 29.3:

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

Emission Unit: 0-OPREM

Process: EAF

Source Classification Code: 3-05-005-03

Process Description:

This process consists of three electric arc furnaces. Two furnaces, #4 and #6, (emission points 08659 and 08666)



are used to produce various premium alumina based products, the third furnace, #5 (emission point 08667), is used to produce crude boron carbide. Raw materials are batch fed into a furnace where products are formed by fusing raw materials. The premium alumina based products are then poured into a mold, allowed to cool and broken into chunks for further processing. The boron carbide products are formed by fusing raw materials and allowing the molten mass to cool. Once the ingot has cooled, it is removed from the furnace shell for further processing.

Emission Source/Control: 00864 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00865 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00866 - Control
Control Type: FABRIC FILTER

Emission Source/Control: FURN4 - Process

Emission Source/Control: FURN5 - Process

Emission Source/Control: FURN6 - Process

Item 29.4:

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

Emission Unit: 0-OPREM
Process: PRM Source Classification Code: 3-05-035-01
Process Description:

Premium aluminum products - crude premium products from the furnaces are crushed and graded using various mills and screens. Non-specification material is recycled back into the process for further crushing and screening. Magnetic separation removes impurities acquired during processing. The final product is sifted into various grit sizes for packaging.

Emission Source/Control: 00841 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00842 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00844 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0085P - Control
Control Type: FABRIC FILTER



Emission Source/Control: 08403 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 08701 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 08702 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 08703 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 08704 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 08705 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 08706 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 08707 - Control
Control Type: FABRIC FILTER

Emission Source/Control: OPREM - Process

Emission Source/Control: FURN6 - Process

Item 29.5:

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

Emission Unit: 0-INSIG
Process: PKG Source Classification Code: 3-99-999-89
Process Description:
Final products are packaged into bags, drums or sacks for shipment to customers.

Emission Source/Control: PCK76 - Process

Emission Source/Control: PCK83 - Process

Emission Source/Control: PCK84 - Process

Emission Source/Control: PCK88 - Process

Emission Source/Control: PK200 - Process

Item 29.6:

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

Emission Unit: 0-INSIG
Process: PLS Source Classification Code: 5-03-008-10



Process Description:

Storage piles are located outside buildings 39, 86, and 88. These piles contain waste materials such as dust collector fines, metal fines from magnetic separation, and product nuggets from furnacing, along with recyclable material from the two settling bay areas outside buildings 86 and 88. The material located outside building 86 is contained within three walls and a roof. The material outside building 88 is contained within a concrete berm with three enclosed sides and will be tarped. The material from the nugget pile is located on a concrete pad with a retaining wall and will be wetted prior to removal offsite.

Emission Source/Control: BAYFN - Process

Emission Source/Control: DINGT - Process

Item 29.7:

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

Emission Unit: 0-SPECL

Process: PRI

Source Classification Code: 3-05-035-01

Process Description:

Primary crushing: raw materials are shipped to the plant or come from Bldg 86 in chunks up to 24 inches in diameter. The primary crushing line reduces this material to 1 to 4 inches. This material is then sent to other areas of the plant for further processing or to customers.

Emission Source/Control: 00821 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00822 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00823 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00824 - Control

Control Type: FABRIC FILTER

Emission Source/Control: MAINC - Process

Emission Source/Control: PRIMA - Process

Item 29.8:

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

Emission Unit: 0-SPECL

Process: SPL

Source Classification Code: 3-05-035-02



Process Description:

Specialty products - raw materials from the primary crusher are crushed and graded using various mills and screens. Materials from other plant locations or deliveries are also processed. Non- specification material is recycled back into the process for further crushing and screening. Magnetic separation removes impurities acquired during processing. The final product is sifted into various grit sizes for packaging.

Emission Source/Control: 00831 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00833 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00834 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00835 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00836 - Control
Control Type: FABRIC FILTER

Emission Source/Control: REGRD - Process

Condition 30: Compliance Certification
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement:6 NYCRR 212.3 (b)

Item 30.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0PREM
Process: B4C

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

Item 30.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Solid particulate emissions from emission points 86E68 and 86E69 associated with thr boron carbide line shall not exceed 0.15 grains per dry standard cubic foot of exhaust gas. There are two fabric collectors, east and west, providing emissions control for a variety of



grinders, mills, conveyors, elevators and screens.

The pressure drop across each fabric filter collector will be monitored and recorded on a daily basis. Values outside the normal operating ranges that are established each time the bags are replaced will require that corrective maintenance procedures as described in the Facility Inspection Plan be implemented in order to maintain compliance with the particulate emission limit.

The permittee is required to maintain the physical and operational integrity of the control equipment through the implementation of the Facility Dust Collector Inspection and Recordkeeping Plan contained within this permit.

In the event of malfunctions in the process or dust collector system which result in an excess emissions event, the facility is required to immediately shut down the affected furnace and notify this Department within 2 hours of the occurrence. A written explanation is to follow within 14 days of the event.

Records of quarterly inspections are to be maintained in a log book and are to include dates of inspections, pressure drop readings, calibrations, control equipment maintenance and conditions requiring corrective actions along with completion dates of the corrective actions taken. These records and other data recorded during inspections shall be retained in company files for a period of not less than five years and shall be made available to Department representatives for review during normal business hours.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: DAILY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 31: Compliance Certification

Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement: 6 NYCRR 212.4 (c)



Item 31.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-OPREM

Process: EAF

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 31.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

There are three submerged electric arc furnaces used to produce fused aluminum oxide and boron carbide. Two furnaces #4 and #6, are associated with the production of aluminum oxide and the third, #5 furnace, is used for the furnacing of raw boron carbide.

Each furnace has a dedicated fabric filter (emission points 08659,08666 and 08667 to control particulate emissions consisting of unfused alumina and boron carbide. Collected fines (remix) are fed back into the furnaces. Furnace #6 is the main furnace in the production of aluminum oxide.

These furnaces, constructed and/or modified after July 1973 are subject to the particulate standard 6NYCRR, Part 212.4(c) which limits particulate emissions to 0.05gr/dscf.

The permittee is required to maintain the physical and operational integrity of the control equipment through the implementation of the Facility Dust Collector Inspection and Recordkeeping Plan contained within this permit.

In the event of malfunctions in the process or dust collector system which result in an excess emissions event, the facility is required to immediately shut down the affected furnace and notify this Department within 2 hours of the occurrence. A written explanation is to follow within 14 days of the event.

Records of quarterly inspections are to be maintained in a log book and are to include dates of inspections, pressure drop readings, calibrations, control equipment maintenance and conditions requiring corrective actions along with completion dates of the corrective actions taken. These records and other data recorded during inspections shall

New York State Department of Environmental Conservation

Permit ID: 9-2911-00160/00075

Facility DEC ID: 9291100160



be retained in company files for a period of not less than five years and shall be made available to Department representatives for review during normal business hours.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: WHEN THE SOURCE IS OPERATING

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED PER OCCURRENCE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 32: Compliance Certification
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable Federal Requirement: 6 NYCRR 212.3 (b)

Item 32.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-OPREM

Emission Point: 08447

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 32.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Solid particulate emissions from emission point 08447 shall not exceed 0.15 grains per dry standard cubic foot of exhaust gas.

The pressure drop across each fabric filter collector will be monitored and recorded on a daily basis. Values outside the normal operating ranges that are established each time the bags are replaced will require that corrective maintenance procedures as described in the Facility Inspection Plan be implemented in order to maintain compliance with the particulate emission limit.

The permittee is required to maintain the physical and operational integrity of the control equipment through the implementation of the Facility Dust Collector Inspection and Recordkeeping Plan contained within this permit.



In the event of malfunctions in the process or dust collector system which result in an excess emissions event, the facility is required to immediately shut down the affected furnace and notify this Department within 2 hours of the occurrence. A written explanation is to follow within 14 days of the event.

Records of quarterly inspections are to be maintained in a log book and are to include dates of inspections, pressure drop readings, calibrations, control equipment maintenance and conditions requiring corrective actions along with completion dates of the corrective actions taken. These records and other data recorded during inspections shall be retained in company files for a period of not less than five years and shall be made available to Department representatives for review during normal business hours.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: DAILY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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



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

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

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

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

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

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

Condition 33: Contaminant List
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable State Requirement:ECL 19-0301

Item 33.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

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



Condition 34: Malfunctions and start-up/shutdown activities
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable State Requirement:6 NYCRR 201-1.4

Item 34.1:

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

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

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

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

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

Condition 35: Visible Emissions Limited
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable State Requirement:6 NYCRR 211.2

Item 35.1:

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.



**** Emission Unit Level ****

Condition 36: Compliance Demonstration
Effective between the dates of 12/22/2014 and 12/21/2019

Applicable State Requirement:6 NYCRR 211.2

Item 36.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-INSIG

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 36.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.

Parameter Monitored: OPACITY

Lower Permit Limit: 1 presence of cond: yes=1; no=0

Monitoring Frequency: DAILY

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

