



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-5622-00067/00001
Mod 0 Effective Date: 07/10/2008 Expiration Date: No expiration date.
Mod 1 Effective Date: 12/02/2009 Expiration Date: No expiration date.

Permit Issued To: HILLCREST INDUSTRIES INC
1176 MINKEL RD
STRYKERSVILLE, NY 14145-9520

Contact: DANIEL E KIRSCH
HILLCREST INDUSTRIES INC
40 FAVOR ST
ATTICA, NY 14011
(585) 591-1182

Facility: HILLCREST INDUSTRIES INC
40 FAVOR ST
ATTICA, NY 14011

Contact: DANIEL E KIRSCH
HILLCREST INDUSTRIES INC
40 FAVOR ST
ATTICA, NY 14011
(585) 591-1182

Description: Hillcrest Industries, Inc.

Permit Renewal 0, Modification 1

This permit is being modified to show a new owner, the addition of new operations, and the replacement of two baghouses with a newer one. OPTA Minerals, Inc. held the previous permit for the operations described below at this facility. The permit is being transferred to Hillcrest Industries, Inc. the operator of the facility.

The grit sizing and conveying sources that exhausted into baghouses 3 and 4 now exhaust into a newer Torit baghouse which exhausts to emission point 3. The replaced baghouses have been abandoned in place. The Torit baghouse can exhaust outside or inside to save heating costs. An auxiliary drum drier fired by natural gas has been added along with a dedicated baghouse, emission unit



0-0000C. The drier will process cullet and small quantities of other materials. The outdoor grit crusher was removed from service so the related permit conditions was also removed from the permit.

Three glass bead manufacturing furnaces will be installed on site and are in new emission units 0-000D1, 0-000D2 and 0-000D3. The furnaces are natural gas fired and exhaust through a drop box and cyclone to recover the glass beads. One of the glass furnaces was emission tested at a previous location and was found to be in compliance with the applicable particulate limit.

Permit Renewal 0 Modification 0

This facility utilizes industrial coal boiler slag to manufacture abrasives and shingle rock (a component of roofing shingle manufacturing). The process consists of drying, grinding and sizing of boiler slag (raw materials). The raw material is received by truck. Finished products are shipped by bag, bin, bulk truck and bulk rail.

The major emissions from these processes are black particulates. The facility utilizes various bag filters to control particulate emissions from enclosed operations which vent to the atmosphere through emission points. However, the facility also has various open material handling and transporting operations which must be controlled by water sprays and by using tarps on trucks, etc. This permit contains particulate control requirements and particulate emission limits. Also, under this permit, stack testing can be required if visible emissions indicate that there is a potential for a particulate emission limit to be exceeded.

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

Permit Administrator: DOUGLAS E BORSCHEL
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the 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
 - Permit modifications, suspensions or revocations by the Department

Facility Level

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



DEC GENERAL CONDITIONS
****** General Provisions ******
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 1-1: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-1.1:

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

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

Condition 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 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 1-2: Submission of application for permit modification or renewal-REGION 9

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 1-2.1:

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



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 14203-2999
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-5622-00067/00001

Facility DEC ID: 9562200067



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: HILLCREST INDUSTRIES INC
1176 MINKEL RD
STRYKERSVILLE, NY 14145-9520

Facility: HILLCREST INDUSTRIES INC
40 FAVOR ST
ATTICA, NY 14011

Authorized Activity By Standard Industrial Classification Code:
3291 - ABRASIVE PRODUCTS

Mod 0 Permit Effective Date: 07/10/2008
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 12/02/2009
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-1 6 NYCRR 212.4: Compliance Demonstration
- 1-2 6 NYCRR 212.6 (a): Compliance Demonstration

Emission Unit Level

EU=0-0000A,EP=00001

- 1-3 6 NYCRR 212.4: Compliance Demonstration

EU=0-0000B,EP=00002

- 1-4 6 NYCRR 212.4: Compliance Demonstration

EU=0-0000B,EP=00003

- 1-5 6 NYCRR 212.4: Compliance Demonstration

EU=0-0000C,EP=00004

- 1-6 6 NYCRR 212.4: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 5 ECL 19-0301: Contaminant List
- 1-7 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 7 6 NYCRR Subpart 201-5: Emission Unit Definition
- 1-8 6 NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 9 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 10 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=0-0000B,Proc=FUG,ES=00070

- 1-9 6 NYCRR 211.2: Compliance Demonstration

EU=0-0000B,Proc=FUG,ES=00080

- 13 6 NYCRR 211.2: Compliance Demonstration

EU=0-0000B,Proc=FUG,ES=00100

- 1-10 6 NYCRR 211.2: Compliance Demonstration

EU=0-0000B,Proc=FUG,ES=00110

- 1-11 6 NYCRR 211.2: Compliance Demonstration

EU=0-0000B,Proc=FUG,ES=00115

- 16 6 NYCRR 211.2: Compliance Demonstration



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

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 labeling 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.

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.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR 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.

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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



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

Item F: Recycling and Salvage - 6 NYCRR 201-1.7

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.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

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.

Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

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.

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

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

Item J: Required Emission Tests - 6 NYCRR 202-1.1



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 6 NYCRR Subpart 202-1.

Item K: Visible Emissions Limited - 6 NYCRR 211.3

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.

Item L: Open Fires - 6 NYCRR Part 215

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.

Item M: 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 N: 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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1-1: Compliance Demonstration
Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4

Item 1-1.1:

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

Emission Unit: 0-000D1 Emission Point: 00005

Emission Unit: 0-000D2 Emission Point: 00006

Emission Unit: 0-000D3 Emission Point: 00007

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

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1.) The particulate emissions shall not exceed 3.30 lbs/hr from each of these emission points.
- 2.) In order to monitor the proper operation of the process and particulate control device, the facility shall undertake daily visible emissions observations during daylight hours. Each observation shall be a minimum of 3 consecutive minutes.
- 3.) The visible emissions observation shall be made from a position which allows the observer to discount the presence of condensed water vapor in the plume.
- 4.) The results of the daily observation shall be recorded in a log book which is kept on site and made available to the Department upon request during normal business hours. When an inspection is not made because the source is not operating the log shall reflect that this is why the observation was not made.



5.) In the event visible emissions are observed during any daily observation, the facility shall conduct an interior inspection of the process and particulate control device, and undertake corrective action so that visible emissions are no longer present in the exhaust plume. All such events shall be reported to the Department in writing within two (2) business days of the occurrence, including the corrective action taken and the success of the corrective action to eliminate visible emissions. A copy of this notification shall be kept with the log book.

6.) In the event the corrective action fails to eliminate visible emissions, the facility shall submit a compliance emission test protocol to the Department within 30 days of the initial visible emissions observation for review and approval. A compliance emission test must be conducted within 60 days of written protocol approval by the Department. An emission test report shall be submitted to the Department for review and approval within 30 days of the emission testing.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 3.30 pounds per hour

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-2: Compliance Demonstration
Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 1-2.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-0000A	Emission Point: 00001
Emission Unit: 0-0000B	Emission Point: 00002
Emission Unit: 0-0000B	Emission Point: 00003
Emission Unit: 0-0000C	Emission Point: 00004
Emission Unit: 0-000D1	Emission Point: 00005
Emission Unit: 0-000D2	Emission Point: 00006



Emission Unit: 0-000D3

Emission Point: 00007

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1.) No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.
- 2.) In order to monitor the proper operation of the process and particulate control device, the facility shall conduct daily visible emissions observations during daylight hours. Each observation shall be a minimum of 3 consecutive minutes.
- 3.) The visible emissions observation shall be made from a position which allows the observer to discount the presence of condensed water vapor in the plume.
- 4.) The results of the daily observation shall be recorded in a log book which is kept on site and made available to the Department upon request during normal business hours. When an inspection is not made because the source is not operating the log shall reflect that this is why the observation was not made.
- 5.) In the event visible emissions are observed above the normal level (this may be zero percent opacity for many or all emission sources) during any daily observation, the facility shall conduct an interior inspection of the process and particulate control device, and undertake corrective action so that visible emissions return to their normal level. All such events shall be reported to the Department in writing within two (2) business days of the occurrence, including the corrective action taken and the success of the corrective action to eliminate visible emissions. A copy of this notification shall be kept with the log book.
- 6.) In the event the corrective action fails to eliminate visible emissions, the facility shall conduct an EPA Method 9 opacity observation by a certified observer within 3 days. The results of the Method 9 observation shall be submitted to the Department within a week of making the observations.



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

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

Condition 1-3: Compliance Demonstration
Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4

Replaces Condition(s) 1

Item 1-3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000A Emission Point: 00001

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

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

1.) The emissions of particulates associated with the production and transport of black abrasive grit have been determined to be the primary source of an ongoing black grit fallout problem in the nearby residential community. Therefore under Part 212.9(a), process emissions of this air contaminant have been assigned an Environmental Rating of A.

2.) For a particulate air contaminant having an Environmental Rating of A and the source having an emission rate potential of 1876 pounds per hour the required control efficiency is 99% or greater or best available control technology (BACT). Stack testing completed in 2005 demonstrated that the bag collector control device was able to substantially control emissions such that the average of the three test runs emission rate was 1.01 pound per hour. The individual test run values were 0.90, 0.96 and 1.16 which have a standard deviation



Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4

Replaces Condition(s) 2

Item 1-4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000B

Emission Point: 00002

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1.) The emissions of particulates associated with the production and transport of black abrasive grit have been determined to be the primary source of an ongoing black grit fallout problem in the nearby residential community. Therefore under Part 212.9(a), process emissions of this air contaminant have been assigned an Environmental Rating of A.
- 2.) For a particulate air contaminant having an Environmental Rating of A and the source having an emission rate potential of 1126.13 pounds per hour the required control efficiency is 99.9% or greater or best available control technology (BACT). The estimated emission rate assuming 99.9% control efficiency for BACT is 1.13 pounds per hour. Allowing for variance, the allowable emission rates shall be $1.13 \times 1.02 = 1.36$ pounds per hour.
- 3.) In order to monitor the proper operation of the material handling bag collector, the facility shall undertake daily visible emissions observations. Each observation shall be a minimum of 3 consecutive minutes.
- 4.) The visible emissions observation shall be made from a position which allows the observer to discount the presence of condensed water vapor in the plume.
- 5.) The results of the daily observation shall be recorded in a log book which is kept on site and made available to the Department upon request during normal business hours. When an inspection is not made because the source is not operating the log shall reflect that this is



why the observation was not made.

6.) In the event visible emissions are observed during any daily observation, the facility shall conduct an interior inspection of the bag collector and undertake corrective action so that visible emissions are no longer present in the exhaust plume. All such events shall be reported to the Department in writing within two (2) business days of occurrence, including the corrective action taken and the ability of the corrective action to eliminate visible emissions. A copy of this notification shall be kept with the log book.

7.) In the event the corrective action fails to eliminate visible emissions, the facility shall submit a compliance emission test protocol to the Department within 30 days of the initial visible emissions observation for review and approval. A compliance emission test must be conducted within 60 days of written protocol approval by the Department. An emission test report shall be submitted to the Department for review and approval within 30 days of the emission testing.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 1.36 pounds per hour

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-5: Compliance Demonstration
Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4

Replaces Condition(s) 3, 4

Item 1-5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000B

Emission Point: 00003

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

1.) The emissions of particulates associated with the



production and transport of black abrasive grit have been determined to be the primary source of an ongoing black grit fallout problem in the nearby residential community.

Therefore under Part 212.9(a), process emissions of this air contaminant have been assigned an Environmental Rating of A.

2.) For a particulate air contaminant having an Environmental Rating of A and the source having an emission rate potential of 100 pounds per hour the required control efficiency is 99% or greater or best available control technology (BACT). The estimated emission rate assuming 99.9% control efficiency for BACT is 1.0 pounds per hour. Allowing for variance, the allowable emission rates shall be $1.0 \times 1.02 = 1.02$ pounds per hour.

3.) In order to monitor the proper operation of the material handling bag collector, the facility shall undertake daily visible emissions observations. Each observation shall be a minimum of 3 consecutive minutes.

4.) The visible emissions observation shall be made from a position which allows the observer to discount the presence of condensed water vapor in the plume.

5.) The results of the daily observation shall be recorded in a log book which is kept on site and made available to the Department upon request during normal business hours. When an inspection is not made because the source is not operating the log shall reflect that this is why the observation was not made.

6.) In the event visible emissions are observed during any daily observation, the facility shall conduct an interior inspection of the bag collector and undertake corrective action so that visible emissions are no longer present in the exhaust plume. All such events shall be reported to the Department in writing within two (2) business days of occurrence, including the corrective action taken and the ability of the corrective action to eliminate visible emissions. A copy of this notification shall be kept with the log book.

7.) In the event the corrective action fails to eliminate visible emissions, the facility shall submit a compliance emission test protocol to the Department within 30 days of the initial visible emissions observation for review and approval. A compliance emission test must be conducted within 60 days of written protocol approval by the Department. An emission test report shall be submitted to

New York State Department of Environmental Conservation

Permit ID: 9-5622-00067/00001

Facility DEC ID: 9562200067



the Department for review and approval within 30 days of the emission testing.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 1.02 pounds per hour

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-6: Compliance Demonstration
Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4

Item 1-6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000C

Emission Point: 00004

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1.) The emissions of particulates associated with the production and transport of black abrasive grit have been determined to be the primary source of an ongoing black grit fallout problem in the nearby residential community. Therefore under Part 212.9(a), process emissions of this air contaminant have been assigned an Environmental Rating of A.
- 2.) For a particulate air contaminant having an Environmental Rating of A and the source having an emission rate potential of 104 pounds per hour the required control efficiency is 99% or greater or best available control technology (BACT). The estimated emission rate assuming 99.7% control efficiency for BACT is 1.04 pounds per hour. Allowing for variance, the allowable emission rates shall be $1.04 \times 1.02 = 1.06$ pounds per hour.
- 3.) In order to monitor the proper operation of the material handling bag collector, the facility shall undertake daily visible emissions observations. Each observation shall be a minimum of 3 consecutive



minutes.

4.) The visible emissions observation shall be made from a position which allows the observer to discount the presence of condensed water vapor in the plume.

5.) The results of the daily observation shall be recorded in a log book which is kept on site and made available to the Department upon request during normal business hours. When an inspection is not made because the source is not operating the log shall reflect that this is why the observation was not made.

6.) In the event visible emissions are observed during any daily observation, the facility shall conduct an interior inspection of the bag collector and undertake corrective action so that visible emissions are no longer present in the exhaust plume. All such events shall be reported to the Department in writing within two (2) business days of occurrence, including the corrective action taken and the ability of the corrective action to eliminate visible emissions. A copy of this notification shall be kept with the log book.

7.) In the event the corrective action fails to eliminate visible emissions, the facility shall submit a compliance emission test protocol to the Department within 30 days of the initial visible emissions observation for review and approval. A compliance emission test must be conducted within 60 days of written protocol approval by the Department. An emission test report shall be submitted to the Department for review and approval within 30 days of the emission testing.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 1.06 pounds per hour

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Item B: 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 only enforceable.



Condition 5: Contaminant List

Effective between the dates of 07/10/2008 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 5.1:

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 1-7: Unavoidable noncompliance and violations

Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Replaces Condition(s) 6

Item 1-7.1:

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

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

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



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

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

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

**Condition 7: Emission Unit Definition
Effective between the dates of 07/10/2008 and Permit Expiration Date**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 7.1(From Mod 1):

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

Emission Unit: 0-0000A

Emission Unit Description:

Grit Dryer

Building(s): MAIN

Item 7.2(From Mod 1):

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

Emission Unit: 0-0000B

Emission Unit Description:

Conveying, crushing and screening of grit material, including the conveying of grit material around the property for delivery or other purposes.

Building(s): MAIN

Item 7.3(From Mod 1):

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

Emission Unit: 0-0000C

Emission Unit Description:

Auxiliary drum drier for glass and other materials.

Building(s): MAIN

Item 7.4(From Mod 1):

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

Emission Unit: 0-000D1

Emission Unit Description:

New York State Department of Environmental Conservation

Permit ID: 9-5622-00067/00001

Facility DEC ID: 9562200067



Glass bead furnace #1

Building(s): MAIN

Item 7.5(From Mod 1):

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

Emission Unit: 0-000D2

Emission Unit Description:

Glass bead furnace #2

Building(s): MAIN

Item 7.6(From Mod 1):

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

Emission Unit: 0-000D3

Emission Unit Description:

Glass bead furnace #3

Building(s): MAIN

Condition 1-8: Air pollution prohibited

Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Replaces Condition(s) 8

Item 1-8.1:

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.

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

Condition 9: Emission Point Definition By Emission Unit

Effective between the dates of 07/10/2008 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 9.1(From Mod 1):

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

Emission Unit: 0-0000A

Emission Point: 00001

Height (ft.): 6 Length (in.): 24

Width (in.): 24

Building: MAIN



Item 9.2(From Mod 1):

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

Emission Unit: 0-0000B

Emission Point: 00002
Height (ft.): 20 Length (in.): 14 Width (in.): 14
Building: MAIN

Emission Point: 00003
Height (ft.): 0 Diameter (in.): 30
Building: MAIN

Item 9.3(From Mod 1):

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

Emission Unit: 0-0000C

Emission Point: 00004
Height (ft.): 15 Diameter (in.): 30
Building: MAIN

Item 9.4(From Mod 1):

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

Emission Unit: 0-000D1

Emission Point: 00005
Height (ft.): 20 Diameter (in.): 36
NYTMN (km.): 4750.57 NYTME (km.): 232.58 Building: MAIN

Item 9.5(From Mod 1):

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

Emission Unit: 0-000D2

Emission Point: 00006
Height (ft.): 20 Diameter (in.): 36
NYTMN (km.): 4750.57 NYTME (km.): 232.58 Building: MAIN

Item 9.6(From Mod 1):

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

Emission Unit: 0-000D3

Emission Point: 00007
Height (ft.): 20 Diameter (in.): 36
NYTMN (km.): 4750.57 NYTME (km.): 232.57 Building: MAIN

Condition 10: Process Definition By Emission Unit
Effective between the dates of 07/10/2008 and Permit Expiration Date



Applicable State Requirement:6 NYCRR Subpart 201-5

Item 10.1(From Mod 1):

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

Emission Unit: 0-0000A

Process: 001

Source Classification Code: 3-05-035-05

Process Description:

Wet raw material (slag) is fed by conveyor into a rotary dryer. The dryer is natural gas fired. Dry slag exits the dryer for further processing in the sizing plant. The products of combustion exit the drier and pass through a cyclone and a fabric filter prior to exiting to the atmosphere.

Emission Source/Control: 00011 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00012 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: 00001 - Process

Design Capacity: 10.6 tons per hour

Item 10.2(From Mod 1):

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

Emission Unit: 0-0000B

Process: 002

Source Classification Code: 3-05-035-04

Process Description:

Dried grit exits the rotary drier and is conveyed into a series of grinders and screening units to properly size the product. Oversized material is returned to the head of the plant. Transfer points, screens and conveyors have a dusting potential. The two fabric filters provide suction at numerous locations to capture fugitive emissions of dust and exhaust out their own emission points..

Emission Source/Control: 00013 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00014 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00002 - Process

Design Capacity: 10.6 tons per hour

Item 10.3(From Mod 1):

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

Emission Unit: 0-0000B

Process: FUG

Source Classification Code: 3-05-035-04



Process Description:

This process includes all operations which result in fugitive dust emissions. In particular, emissions from truck traffic on unpaved plant roads, emissions from open transport trucks, accumulation and movement of air cleaner waste from dust collectors, emissions from waste grit storage piles, and truck and railcar loading.

Emission Source/Control: 00002 - Process
Design Capacity: 10.6 tons per hour

Emission Source/Control: 00070 - Process

Emission Source/Control: 00080 - Process

Emission Source/Control: 00100 - Process

Emission Source/Control: 00110 - Process

Emission Source/Control: 00115 - Process

Item 10.4(From Mod 1):

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

Emission Unit: 0-0000C

Process: 003

Source Classification Code: 3-05-035-05

Process Description:

The auxiliary drier is used to dry glass cullet and some other materials as needed. The drier is more flexible to handle smaller batch runs because of its lower throughput and smaller burner. Operation is similar to the larger rotary drum drier in EU 0000A.

Emission Source/Control: 00007 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00003 - Process
Design Capacity: 3 tons per hour

Item 10.5(From Mod 1):

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

Emission Unit: 0-000D1

Process: 004

Source Classification Code: 3-99-999-94

Process Description:

Glass bead manufacturing furnace #1. Pre-sized glass particles are deposited in a gas fired combustion chamber. The heat melts the particles so they assume a spherical shape. 80% of the feed is collected in the air cooled chambers immediately downstream of the combustion zone. The remainder of the product is collected in the dropout chamber and the high efficiency cyclone.



Emission Source/Control: 00004 - Combustion

Emission Source/Control: 00008 - Control
Control Type: SINGLE CYCLONE

Item 10.6(From Mod 1):

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

Emission Unit: 0-000D2
Process: 005 Source Classification Code: 3-99-999-94
Process Description:

Glass bead manufacturing furnace #2. Pre-sized glass particles are deposited in a gas fired combustion chamber. The heat melts the particles so they assume a spherical shape. 80% of the feed is collected in the air cooled chambers immediately downstream of the combustion zone. The remainder of the product is collected in the dropout chamber and the high efficiency cyclone.

Emission Source/Control: 00005 - Combustion

Emission Source/Control: 00009 - Control
Control Type: SINGLE CYCLONE

Item 10.7(From Mod 1):

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

Emission Unit: 0-000D3
Process: 006 Source Classification Code: 3-99-999-94
Process Description:

Glass bead manufacturing furnace #3. Pre-sized glass particles are deposited in a gas fired combustion chamber. The heat melts the particles so they assume a spherical shape. 80% of the feed is collected in the air cooled chambers immediately downstream of the combustion zone. The remainder of the product is collected in the dropout chamber and the high efficiency cyclone.

Emission Source/Control: 00006 - Combustion

Emission Source/Control: 00010 - Control
Control Type: SINGLE CYCLONE

Condition 1-9: Compliance Demonstration
Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Replaces Condition(s) 12

Item 1-9.1:

The Compliance Demonstration activity will be performed for:



Emission Unit: 0-0000B
Process: FUG

Emission Source: 00070

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

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

TRUCK TRAFFIC ON PLANT ROADWAYS DUST CONTROL

- 1.) The facility's grit manufacturing operations have been determined to be the primary source of an ongoing particulate fallout problem in the downwind residential community. Therefore, the facility shall take steps to control fugitive dust emissions at their sources.
- 2.) Truck traffic on both paved and unpaved roads can result in wind borne particulate fugitive emissions.
- 3.) In order to control road dust from truck traffic, the facility shall undertake the following measures which are part of the August 2009 Dust Control Plan:
 - a.) The facility shall restrict all truck traffic to only those roads on plant property which have been improved by the paving or application of a stone surface with the exception of trucks delivering raw material to the stockpiles.
 - b.) All trucks on plant property shall limit speed to 15 mph.
 - c.) Where visible dust emissions are occurring as a result of material spillage or accumulation of fine material on roadways remedial measures shall be undertaken within 2 business days. Control measures shall include but not limited to cleanup of spilled material, application of additional stone and where this is not feasible the application of environmentally acceptable dust control agent(s).
 - d.) In the event high winds are contributing to road dust emissions, truck movement shall be discontinued until such a time that wind speed is no longer contributing to a road dust emission.
 - e.) On a daily basis observe all of the paved and



stone covered roadways on the plant property to see if they are the source of dust emissions.

f.) The facility shall keep a log which reflects the date and time that of the observation, whether any dust was observed becoming wind borne and remedial action being undertaken and the date such action was taken. The log shall be kept on site and made available to the Department upon request during normal business hours.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Compliance Demonstration
Effective between the dates of 07/10/2008 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000B

Process: FUG

Emission Source: 00080

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

TRANSPORT VEHICLES DUST CONTROL

- 1.) The facility's grit manufacturing operations have been determined to be the primary source of an ongoing particulate fallout problem in the downwind residential community. Therefore, the facility shall take steps to control fugitive dust emissions at their source.
- 2.) Trucks hauling grit can cause wind borne particulate emissions.
- 3.) Trucks hauling material from Kodak to the plant and trucks hauling bulk product off site shall be tarped. In addition all trucks shall be tarped after loading finished product, during transport of the finished product to the rail car area, and during the entire unloading operation of the finished product into the rail car.
- 4.) Trucks shall be inspected weekly to ensure that all trucks are equipped with tarps and associated mechanisms



are functioning properly.

5.) The date of the inspection and trucks inspected shall be recorded in a log. The log shall be maintained on site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-10: Compliance Demonstration
Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Replaces Condition(s) 14

Item 1-10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000B

Process: FUG

Emission Source: 00100

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

PARTICULATE STORAGE PILE DUST CONTROL

1.) The facility's grit manufacturing operations have been determined to be the primary source of an ongoing particulate fallout problem in the downwind residential community. Therefore, the facility shall take steps to control fugitive dust emissions at their source.

2.) Outside storage of waste air cleaner dust has caused serious wind borne fugitive particulate emissions. Therefore, the storage of this material in outside open piles is prohibited.

3.) Air cleaner waste is collected and currently stored in super sacks to eliminate fugitive particulate emissions. The bags are stored on plant property. The facility shall inspect this storage area weekly and check for leaking bags and potential dust problems.

4.) The date that the super sacks are filled shall be



recorded on the bags in a permanent manner. The air cleaner waste may not be stored on site for more than 18 months based on the date of origin written on the bag. (Appendix A of Consent Order R9-20090702-40 signed August 18, 2009.)

5.) The facility shall keep a log which reflects the date and time that the waste storage area was inspected, whether any wind borne dust was observed and whether any corrective action was taken. The log shall be kept on site and made available to the Department upon request during normal business hours.

Monitoring Frequency: WEEKLY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-11: Compliance Demonstration
Effective between the dates of 12/02/2009 and Permit Expiration Date

Applicable State Requirement: 6 NYCRR 211.2

Replaces Condition(s) 15

Item 1-11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000B

Process: FUG

Emission Source: 00110

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

TRUCK LOADING DUST CONTROL

1.) The facility's grit manufacturing operations have been determined to be the primary source of an ongoing particulate fallout problem in the downwind residential community. Therefore, the facility shall take steps to control fugitive dust emissions at their source.

2.) Manufactured grit product is loaded onto trucks for transportation to customers or for transport for a short distance to rail cars for shipping. The loading operation from the silo using a drop chute can result in fugitive dust emissions.

3.) In order to control truck loading emissions, the facility shall undertake the following measures:



a.) The free fall distance of grit from the end of the chute to the bed of the truck shall be such that grit does not become wind borne.

b.) If grit is observed becoming wind borne due to adverse wind conditions, loading operations shall be discontinued.

c.) The loading operation shall be observed during loading and the distance between the chute and the truck bed (material surface), estimated wind velocity and whether grit is becoming wind borne shall be recorded in a log.

d.) The log shall be maintained on site and made available to the Department upon request during normal business hours.

4.) The facility fabricated and installed a vacuum pick up point and air cleaner in 2008 to capture dust from the silo truck loading operations. This dust collection system must be operated whenever the silo is loading a truck or container.

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 16: Compliance Demonstration
Effective between the dates of 07/10/2008 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000B

Process: FUG

Emission Source: 00115

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RAIL CAR LOADING DUST CONTROL

1.) The facility's grit manufacturing operations have been determined to be the primary source of an ongoing particulate fallout problem in the downwind residential



community. Therefore, the facility shall take steps to control fugitive dust emissions at their source.

2.) Manufactured grit product is loaded into rail cars nearby the facility for transportation to customers. The loading operation from trucks to the rail car can result in fugitive emissions.

3.) In order to control rail car loading emissions, the facility shall undertake the following measures:

a.) During rail car loading the free fall distance of grit from truck to the conveyor and from the conveyor into the rail car shall be such that grit does not become wind borne.

b.) If grit is observed becoming wind borne due to adverse wind conditions, loading operations shall be discontinued.

c.) The loading operation shall be observed during loading and the distance between the truck and conveyor and the conveyor and the rail car (material surface), estimated wind velocity and whether grit is becoming wind borne shall be recorded in a log.

d.) The log shall be maintained on site and made available to the Department upon request during normal business hours.

4.) If the rail car spur is relocated to the plant property sometime in the future, the facility shall only comply with loading requirements from the silo chute to the rail car according to the above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

