



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 4-2732-00014/00057

Renewal Number: 2

08/18/2010

Facility Identification Data

Name: KEYMARK CORP PLANT

Address: 1188 CAYADUTTA ST

FONDA, NY 12068

Owner/Firm

Name: KEYMARK CORPORATION

Address: 1188 CAYADUTTA ST

FONDA, NY 12068, USA

Owner Classification: Corporation/Partnership

Permit Contacts

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CAYADUTTA ST

FONDA, NY 12068

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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

Attainment Status

KEYMARK CORP PLANT is located in the town of MOHAWK in the county of MONTGOMERY.



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The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

| Criteria Pollutant | Attainment Status |
|---|-------------------------|
| Particulate Matter (PM) | ATTAINMENT |
| Particulate Matter < 10µ in diameter (PM10) | ATTAINMENT |
| Sulfur Dioxide (SO2) | ATTAINMENT |
| Ozone* | MARGINAL NON-ATTAINMENT |
| Oxides of Nitrogen (NOx)** | ATTAINMENT |
| Carbon Monoxide (CO) | ATTAINMENT |

- * Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
- ** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

Keymark is an aluminum extrusion facility located in Fonda, New York. The basic flow of operations at the facility are as follows. Scrap aluminum, sows, ingots, etc. are charged to a melter which is heated with a natural gas burner. A typical charge is 55,000 pounds. At specified times, the molten aluminum is transferred to a holder which is subsequently tapped in order to cast logs. The cast logs are transferred to one of three homogenizing furnaces in order to obtain the proper alloy structure. The cast logs, which may be supplemented with purchased logs, are then transferred to one of four extrusion presses. In the presses, the logs are preheated and then rammed through preheated dies in order to form the selected extruded shapes. The dies are manufactured in house in the tool and die shop (KTD). Once the extrusion run has been completed, the dies are taken to the die shop where they are immersed in heated alkaline solutions in order to melt out any residual aluminum. The extruded aluminum shapes are cut to specified lengths and placed into aging ovens which serve to harden the parts. Following the aging ovens, the extruded shapes undergo one of the following steps: surface coating, anodizing, or direct shipment to customers.

Surface coating is performed in one of two conveyerized paint spray lines. Both lines include the following sequence of steps; pretreatment with alkaline and acid showers, drying in an oven, coating, curing in an oven, and flash off. Both lines use thermal oxidizers for volatile organic compound (VOC) control. Processes associated with the paint spray operations include mix room, a coupon spray booth in which small metal plates are coated in order to obtain proper color matching, a pyrolyzing furnace in which dried paint is burned off the hooks used to hang the aluminum parts from the conveyor, and equipment clean up which is exclusively performed using acetone.

Anodizing is performed in a series of solution tanks in a separate portion of the facility. Extruded parts are placed into racks which are then transferred from tank to tank in order to impart a protective coating. Several of the tanks have exhaust systems that vent emissions through roof top scrubbers.

Other activities at the facility include maintenance shops, a fill and debridge area in which resin is injected into the extrude parts and then the part is machined so that a thermal break is formed, waste water treatment facilities, non contact cooling water towers, packaging, and shipping. All fuel fired



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equipment (heaters, ovens, solution tanks, etc.) use natural gas.

Permit Structure and Description of Operations

The Title V permit for KEYMARK CORP PLANT

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

KEYMARK CORP PLANT is defined by the following emission unit(s):

Emission unit U00005 - Cast house melter for aluminum scrap, ingots, sows, etc. Furnace is heated with natural gas burner. Emissions from melting and combustion are ducted through three stacks. A slipstream of air from the melter is ducted to a sow preheater for preheating the sows prior to putting them into the melter. The sow preheater has a separate stack. There is also a fume hood with a separate stack. The fume hood is located over the entrance to the melter. The operation is in the cast house area of the main plant.

Emission unit U00005 is associated with the following emission points (EP):

00005, 00007, 00008

Process: 004 is located at 1, Building 1 - A typical charge to the melter is 55,000 pounds of aluminum. Flux is typically added to each charge but the quantity of flux added is less than 0.5 percent of the total charge. Alloying elements, such as copper and manganese, may also be added.

Process: E02 is located at 1, Building 1 - Natural gas fired burner for the melter. The combustion emissions are exhausted through the stack of the melter, fume hood, and sow preheater. The maximum rated capacity of the burner is 27 mmBtu/hr.

Emission unit U00006 - Cast house holder for molten aluminum received from cast house melter. Holder maintains molten aluminum at temperature prior to tapping and pouring into molds. Furnace is heated with natural gas burner. Emissions from molten aluminum and combustion are ducted through a single stack. Small quantities of magnesium and silicon may be added to the holder per alloy



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specifications. The operation is in the main plant.

Emission unit U00006 is associated with the following emission points (EP):

00006

Process: 005 is located at 1, Building 1 - The holding, tapping, and pouring of molten aluminum results in the emission of hydrochloric acid, dioxan/furan, and particulate matter. A typical charge to the holder is 55,000 pounds of aluminum. Magnesium ingots and silicon disks are typically added, but the quantity is less than 0.5 percent of the charge. Other alloying elements, such as copper, may also be added.

Process: E03 is located at 1, Building 1 - Natural gas fired burner for the holder. The combustion emissions are exhausted through the stack of the holder. The maximum rated capacity of the burner is 27 mmBtu/hr.

Emission unit U00016 - Alkaline pretreatment shower for extruded aluminum parts prior to painting in Paint Line 1. Parts are sprayed with an alkaline solution as they pass through on a conveyor.

Emission unit U00016 is associated with the following emission points (EP):

00016

Process: 012 is located at 1, Building 1 - Extruded aluminum parts are sprayed with an alkaline pretreatment shower prior to painting resulting in the emission of liquid particulate through the stack.

Emission unit U00017 - Acid pretreatment shower for extruded aluminum parts prior to painting in Paint Line 1. Parts are sprayed with an acid solution as they pass through on a conveyor.

Emission unit U00017 is associated with the following emission points (EP):

00017

Process: 013 is located at 1, Building 1 - Extruded aluminum parts are sprayed with an acid pretreatment shower prior to painting resulting in the emission of liquid particulate through the stack.

Emission unit U00026 - Coupon spray paint booth. Small flat metal plates are spray painted in a bench top enclosure in order to match a paint's color tint to prepainted standards. Particulate emissions are controlled with panel filters.

Emission unit U00026 is associated with the following emission points (EP):

00026

Process: 01B is located at 1, Building 1 - The spraying of small metal coupons in a bench top booth results in the emission of volatile organic compounds (VOC) and particulate. Particulate is controlled with panel filters. VOC emissions are exempt from regulation in accordance with 6 NYCRR Part 228.1(e)(1). Acetone, an exempt VOC, non HAP, is used to clean up paint spray equipment.



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Emission unit U00027 - Die shop tanks. Heated alkaline solution tanks in which aluminum is removed from extrusion dies. The tanks are heated with natural gas fired burners. The combustion emissions are exhausted with the process emissions.

Emission unit U00027 is associated with the following emission points (EP):
00027

Process: 01C is located at 1, Building 1 - Solutions of caustic soda and water are heated using natural gas fired burners. Extrusion dies are immersed in the tanks in order to remove residual aluminum. The tanks have process ventilation. Emissions are in the form of liquid particulate. Emissions are controlled with a wet scrubber.

Process: F04 is located at 1, Building 1 - Natural gas fired burners (4) for the solution tanks. The combustion emissions are exhausted through the solution tanks stack. The maximum rated capacity of each burner is 1.0 mmBtu/hr.

Emission unit U00028 - Hook oven. Dried paint on conveyor hooks is removed in a controlled pyrolysis cleaning furnace. The furnace is heated with a natural gas fired burner. The combustion emissions are exhausted with the process emissions.

Emission unit U00028 is associated with the following emission points (EP):
00028

Process: 01D is located at 1, Building 1 - The extruded aluminum parts that are painted in the two paint spray lines are suspended from the conveyors on hooks. To remove the dried paint from the hooks, they are placed in batches in a controlled pyrolysis heating furnace. The furnace is heated with a natural gas fired burner. The majority of the paint is converted to ash and removed as waste. Particulate emissions are minimal.

Process: F05 is located at 1, Building 1 - Natural gas fired burner for the pyrolysis furnace. The combustion emissions are exhausted through the stack of the furnace. The maximum rated capacity of the burner is 0.29 mmBtu/hr.

Emission unit U00029 - Fill and debridge. Channels in extruded aluminum parts are filled with resin. A strip of aluminum is then removed in order to form a thermal barrier.

Emission unit U00029 is associated with the following emission points (EP):
00029

Process: 01E is located at 1, Building 2 - In order to form a thermal break in certain products (e.g. window frames) a two part resin is injected into a channel in the extruded part. A strip of aluminum is then machined away leaving a gap between the two parts of the aluminum extrusion. The two parts of the resin react with negligible emissions. The resin lines are flushed out using a solvent. There are minimal solvent emissions.



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Emission unit U00034 - Paint Line 2. A conveyORIZED paint spray operation in which extruded aluminum parts are hung from hooks and then subjected to the following operations; pretreatment acid and alkaline showers (addressed separately as Emission Units U-30001 and U-30002), drying oven, coating application in two spray booths using electrostatic disks, curing oven, and flash off. Paint is mixed and distributed from a separate room. Solvent is used to clean up the spraying equipment. Filters are used in both booths for particulate control. The exhausts of the two booths, oven, and flash off tunnel are vented through a thermal oxidizer which also has filters.

Emission unit U00034 is associated with the following emission points (EP):
20005, 20006, 20007, 20008, 20009, 20011, 20012

Process: 201 is located at 1, Building 1 - Paint Line 2 paint spray booth 1. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a hydraulic ram. Panel filters are used for particulate control. The exhaust is ducted through a thermal oxidizer which also has particulate control filters.

Process: 202 is located at 1, Building 1 - Paint Line 2 paint spray booth 2. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a hydraulic ram. Panel filters are used for particulate control. The exhaust is ducted through a thermal oxidizer which also has particulate control filters.

Process: 203 is located at 1, Building 1 - Paint Line 2 curing oven. Painted parts are conveyed through a curing oven. The oven is heated using a burner fired by natural gas. Combustion emissions from the burner are vented separately. The oven exhaust is ducted through a thermal oxidizer.

Process: 205 is located at 1, Building 1 - Paint Line 2 dry oven. Following the pretreatment showers, the parts are conveyed through a drying oven prior to painting. The oven is heated with a burner that is fired with natural gas. Combustion emissions from the burner are vented separately.

Process: 206 is located at 1, Building 1 - Paint Line 2 dry oven hood. A hood over the inlet/outlet to the drying oven. The purpose of the hood is to vent heated air from the oven. Emissions vented through this natural draft stack should be minimal.

Process: 207 is located at 1, Building 1 - Paint Line 2 roof vent. One of three roof vents over Paint Line 2 that is primarily designed to remove heat from the area over the curing oven. Emissions vented through the roof vent should be minimal.

Process: 208 is located at 1, Building 1 - Paint Line 2 roof vent. One of three roof vents over Paint Line 2 that is primarily designed to remove heat from the area over the curing oven. Emissions vented through the roof vent should be minimal.

Process: 209 is located at 1, Building 1 - Paint Line 2 roof vent. One of three roof vents over Paint Line 2 that is primarily designed to remove heat from the area over the curing oven. Emissions vented through the roof vent should be minimal.

Process: 210 is located at 1, Building 1 - Paint Line 2 flash off vent. Following the coating of parts in the paint spray booths, the parts are conveyed through a flash off area prior to entering the curing oven. A vent over the area exhausts any emissions that occur during flash off. The vent is ducted through a thermal oxidizer.



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Process: 212 is located at 1, Building 1 - Thermal oxidizer natural gas burner. A natural gas fired burner for the oxidizer with a maximum rated capacity of 2.55 mmBtu/hr.

Emission unit U00035 - Paint Line 1. A conveyORIZED paint spray operation in which extruded aluminum parts are hung from hooks and then subjected to the following operations: pretreatment acid and alkaline showers (addressed separately as Emission Units U-00016 and U-00017), drying oven, coating application in four spray booths using electrostatic disks, bake oven, and flash off. Paint is mixed and distributed from a separate room. Solvent is used to clean up the spraying equipment. Filters are used in all booths for particulate control. The exhausts of the booths, bake oven, smoke hood, and flash off area are vented through two thermal oxidizers which also have filters.

Emission unit U00035 is associated with the following emission points (EP):

00018, 00019, 00020, 00021, 00022, 00023, 00030, 00045

Process: 006 is located at 1, Building 1 - Paint Line 1 bake oven. Painted parts are conveyed through a bake oven. The oven is heated using a natural gas fired burner. combustion emissions from the burner are vented separately. The oven exhaust is vented through thermal oxidizers.

Process: 008 is located at 1, Building 1 - Paint Line 1 paint spray booth 1. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 009 is located at 1, Building 1 - Paint Line 1 spray booth 2. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 00A is located at 1, Building 1 - Paint Line 1 spray booth 3. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 00B is located at 1, Building 1 - Paint Line 1 spray booth 4. Paint applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 014 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.

Process: 015 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.

Process: 016 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.



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Process: 017 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.

Process: 020 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.

Process: 022 is located at 1, Building 1 - Paint Line 1 smoke hood. A hood over the inlet/outlet to the bake oven. The purpose of the smoke hood is to vent heated air from the oven. The exhaust is vented through thermal oxidizers.

Process: 024 is located at 1, Building 1 - Paint Line 1 flash off tunnel. Following the application of coatings in the paint spray booths, the parts are conveyed through a flash off area. A vent over the area exhausts any emissions that occur during flash off through thermal oxidizers.

Process: E01 is located at 1, Building 1 - Thermal oxidizer natural gas burner. A natural gas fired burner for the Model 30 oxidizer with a maximum rated capacity of 2.81 mmBtu/hr.

Process: E13 is located at 1, Building 1 - Thermal oxidizer natural gas burner. A natural gas fired burner for the Model 25 oxidizer with a maximum rated capacity of 2.7 mmBtu/hr.

Emission unit U00036 - Four aging ovens and one homogenizing furnace. The aging ovens are natural gas fired Granco Clark units each with a maximum burner rating of 2 mmBtu/hr. The homogenizing furnace was installed in July 2005. The furnace is a natural gas fired Romelt Technologies unit with a maximum burner rating of 18 mmBtu/hr. The furnace is housed in a separate building located to the north of the main plant. The only emissions associated with the ovens and furnaces are generated from the combustion of the natural gas.

Emission unit U00036 is associated with the following emission points (EP):
00036, 00037, 00038, 00039, 00043, 00044

Process: E06 is located at 1, Building 1 - Aging Oven 1. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E07 is located at 1, Building 1 - Aging Oven 2. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E08 is located at 1, Building 1 - Aging Oven 3. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E09 is located at 1, Building 1 - Aging Oven 4. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.



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Process: E12 is located at 1, Building 3 - Remelt Technologies Homogenizing Furnace. Following casting, the aluminum logs are placed into a homogenizing furnace to reduce chemical separation of cast structures and improve workability. The furnace is heated with a natural gas fired burner with a maximum rated capacity of 18 mmBtu/hr. There are two exhaust stacks associated with this furnace since the furnace can travel to either of two locations.

Emission unit U10001 - Anodize line solution tank 2. A 15,000 gallon heated solution tank.

Emission unit U10001 is associated with the following emission points (EP):
10001

Process: 025 is located at 1, Building 2 - A 15,000 gallon solution tank is used in the aluminum anodize process. Racked parts are immersed in the tank in order to prepare the parts for subsequent processing. The tank is heated with a natural gas fired burner. Combustion emissions are exhausted separately. The reactions that occur in the tank in conjunction with the heating of the solution result in the emission of liquid particulate.

Emission unit U10007 - Anodize line solution tanks 5 and 7. 8,000 gallon heated solution tanks.

Emission unit U10007 is associated with the following emission points (EP):
10007

Process: 026 is located at 1, Building 2 - Tanks 5 and 7 are both 8,000 gallon solution tanks used in the aluminum anodize process. Racked parts are immersed in the tanks in order to etch the aluminum parts in an alkaline solution prior to subsequent processing. The tanks are heated with natural gas fired burners. Combustion emissions are exhausted separately. The reactions that occur in the tanks in conjunction with the heating of the solutions result in the emission of liquid particulate. The emissions are controlled with a roof mounted Viron FRP Horizontal scrubber.

Emission unit U10008 - Anodize line solution tanks 12A and 12B. 8,000 gallon solution tanks.

Emission unit U10008 is associated with the following emission points (EP):
1008A

Process: 027 is located at 1, Building 2 - Tanks 12A and 12B are both 8,000 gallon solution tanks used in the aluminum anodize process. Racked parts are immersed in the sulfuric anodizing baths in order to impart a hard coat to the parts prior to subsequent processing. The reactions that occur in the tanks result in the emission of liquid particulate. The emissions are controlled with a Viron PVC Mist Eliminator.

Emission unit U30001 - Alkaline pretreatment shower for extruded aluminum parts prior to painting in Paint Line 2. Parts are sprayed with an alkaline solution as they pass through on a conveyor.

Emission unit U30001 is associated with the following emission points (EP):
30001

Process: 301 is located at 1, Building 1 - Extruded aluminum parts are sprayed with an alkaline pretreatment shower prior to painting, resulting in the emission of liquid particulate through the stack.



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Emission unit U30002 - Acid pretreatment shower for extrude aluminum parts prior to painting in Paint
Emission unit U30002 is associated with the following emission points (EP):
30002

Process: 302 is located at 1, Building 1 - Extruded aluminum parts are sprayed with an acid pretreatment shower prior to painting, resulting in the emission of liquid particulate through the stack.

Title V/Major Source Status

KEYMARK CORP PLANT is subject to Title V requirements. This determination is based on the following information:

The facility is major because the potential to emit (PTE) for several contaminants is greater than the Title V applicability thresholds. The PTE for volatile organic compounds (VOC) is greater than 50 tons per year which is the Title V thresholds. The PTE for 4-methyl-2-pentanone, dimethyl phthalate, 2-butoxy-ethanol, ethylbenzene, methyl ethyl ketone, naphthalene, toluene, and xylene are each greater than 10 tons per year which is the Title V threshold for individual hazardous air pollutants (HAP). The PTE for total hazardous air pollutants (HAP) is greater than 25 tons per year which is the Title V thresholds.

Program Applicability

The following chart summarizes the applicability of KEYMARK CORP PLANT with regards to the principal air pollution regulatory programs:

| Regulatory Program | Applicability |
|--------------------------------|---------------|
| PSD | NO |
| NSR (non-attainment) | NO |
| NESHAP (40 CFR Part 61) | NO |
| NESHAP (MACT - 40 CFR Part 63) | YES |
| NSPS | NO |
| TITLE IV | NO |
| TITLE V | YES |
| TITLE VI | NO |
| RACT | YES |
| SIP | YES |

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS)



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for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA)

which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to

be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis

of its primary activity, which is determined by its principal product or group of products produced or



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distributed, or services rendered. Larger facilities typically have more than one SIC code.

| SIC Code | Description |
|----------|----------------------------|
| 3354 | ALUMINUM EXTRUDED PRODUCTS |

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

| SCC Code | Description |
|-------------|---|
| 1-02-006-02 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr |
| 1-02-006-03 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Less Than 10 MMBtu/Hr |
| 3-04-001-14 | SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Pouring/Casting |
| 3-99-999-94 | MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified |
| 4-02-008-10 | SURFACE COATING OPERATIONS COATING OVEN - GENERAL General |
| 4-02-025-01 | SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Coating Operation |
| 4-02-025-99 | SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Other Not Classified |

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The

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term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

| Cas No. | Contaminant Name | PTE | |
|-------------|--------------------------------------|--------|-------------------|
| | | lbs/yr | Range |
| 001746-01-6 | 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN | > 0 | but < 10 tpy |
| 000078-59-1 | 2-CYCLOHEXEN-1-ONE,3,5,5-TRIMETHYL | > 0 | but < 10 tpy |
| 000108-10-1 | 2-PENTANONE, 4-METHYL | >= 10 | tpy |
| 000140-88-5 | 2-PROPENOIC ACID, ETHYL ESTER | > 0 | but < 10 tpy |
| 0NY505-00-0 | 40 CFR 63 SUBPART LL - POM | > 0 | but < 10 tpy |
| 007440-36-0 | ANTIMONY | > 0 | but < 10 tpy |
| 007440-38-2 | ARSENIC | > 0 | but < 10 tpy |
| 000071-43-2 | BENZENE | > 0 | but < 10 tpy |
| 000098-82-8 | BENZENE, (1-METHYLETHYL) | > 0 | but < 10 tpy |
| 000106-46-7 | BENZENE, 1,4-DICHLORO- | > 0 | but < 10 tpy |
| 007440-41-7 | BERYLLIUM | > 0 | but < 10 tpy |
| 007440-43-9 | CADMIUM | > 0 | but < 10 tpy |
| 000630-08-0 | CARBON MONOXIDE | >= 50 | tpy but < 100 tpy |
| 007440-47-3 | CHROMIUM | > 0 | but < 10 tpy |
| 007440-48-4 | COBALT | > 0 | but < 10 tpy |
| 000131-11-3 | DIMETHYL PHTHALATE | >= 10 | tpy |
| 000111-76-2 | ETHANOL, 2-BUTOXY- | >= 10 | tpy |
| 000100-41-4 | ETHYLBENZENE | > 0 | but < 10 tpy |
| 000050-00-0 | FORMALDEHYDE | > 0 | but < 10 tpy |
| 000110-00-9 | FURAN C4H4O | > 0 | but < 2.5 tpy |
| 0NY100-00-0 | HAP | >= 100 | tpy but < 250 tpy |
| 000110-54-3 | HEXANE | > 0 | but < 10 tpy |
| 007647-01-0 | HYDROGEN CHLORIDE | > 0 | but < 10 tpy |
| 007664-39-3 | HYDROGEN FLUORIDE | > 0 | but < 10 tpy |
| 007439-92-1 | LEAD | > 0 | but < 10 tpy |
| 007439-96-5 | MANGANESE | > 0 | but < 10 tpy |
| 007439-97-6 | MERCURY | > 0 | but < 10 tpy |
| 000101-68-8 | METHYLENE BISPHENYL ISOCYANATE | > 0 | but < 10 tpy |
| 000091-20-3 | NAPHTHALENE | >= 10 | tpy |
| 007440-02-0 | NICKEL METAL AND INSOLUBLE COMPOUNDS | > 0 | but < 10 tpy |
| 0NY210-00-0 | OXIDES OF NITROGEN | >= 50 | tpy but < 100 tpy |
| 0NY075-00-0 | PARTICULATES | >= 10 | tpy but < 25 tpy |
| 0NY075-00-5 | PM-10 | >= 10 | tpy but < 25 tpy |
| 007782-49-2 | SELENIUM | > 0 | but < 10 tpy |
| 007446-09-5 | SULFUR DIOXIDE | > 0 | but < 2.5 tpy |
| 000108-88-3 | TOLUENE | >= 10 | tpy |
| 0NY998-00-0 | VOC | >= 100 | tpy but < 250 tpy |
| 001330-20-7 | XYLENE, M, O & P MIXT. | >= 10 | tpy |



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NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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 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 Part 201-6.3(a)(4)

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

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

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

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

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



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- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:
- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
 - ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of Title IV of the Act;
 - iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.
- Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)**



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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.

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NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

**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.

Regulatory Analysis

| Location Facility/EU/EP/Process/ES | Regulation | Condition | Short Description |
|---------------------------------------|--------------------------------|------------|---|
| FACILITY | ECL 19-0301 | 104 | Powers and Duties of the Department with respect to air pollution control |
| FACILITY | 40CFR 63-A | 57 | Subpart A - General Provisions apply to all NESHAP affected sources |
| FACILITY | 40CFR 63- MMMM.3890 (c) (2) | 58 | Misc. Metal Parts & Products Surface Coating MACT - Alternative facility specific emission limits |
| FACILITY | 40CFR 63-MMMM.3891 (c) | 59 | Misc. Metal Parts & Products Surface Coating NESHAP - Compliance options - Add-on Controls |
| FACILITY | 40CFR 63-MMMM.3892 (b) | 60, 61, 62 | Misc. Metal Parts & Products Surface Coating NESHAP - Operating limits for add-on control devices |
| FACILITY | 40CFR 63-MMMM.3893 (b) | 63 | Misc. Metal Parts & Products Surface Coating NESHAP - Work Practice Standards for add-on controls |
| FACILITY | 40CFR 63- MMMM.3900 (a) (2) | 64 | Misc. Metal Parts & Products Surface Coating NESHAP - |

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| FACILITY | 40CFR 63- MMMM.3900 (a) (2) | 65 | General requirements Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements |
| FACILITY | 40CFR 63- MMMM.3900 (a) (2) | 66 | Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements |
| FACILITY | 40CFR 63-MMMM.3900 (b) | 67 | Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements |
| FACILITY | 40CFR 63-MMMM.3900 (c) | 68 | Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements |
| FACILITY | 40CFR 63-MMMM.3901 | 69 | Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements |
| FACILITY | 40CFR 63-MMMM.3920 (a) | 70 | Misc. Metal Parts & Products Surface Coating NESHAP - Reporting Requirements |
| FACILITY | 40CFR 63-MMMM.3920 (b) | 71 | Misc. Metal Parts & Products Surface Coating NESHAP - Reporting requirements |
| FACILITY | 40CFR 63-MMMM.3920 (c) | 72 | Misc. Metal Parts & Products Surface Coating NESHAP - Reporting requirements |
| FACILITY | 40CFR 63-MMMM.3930 (a) | 73 | Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements |
| FACILITY | 40CFR 63-MMMM.3930 (b) | 74 | Misc. Metal Parts and Products Surface Coating NESHAP - Recordkeeping requirements |
| FACILITY | 40CFR 63- MMMM.3930 (c) (4) | 75 | Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements |
| FACILITY | 40CFR 63-MMMM.3930 (d) | 76 | Misc. Metal Parts and Products Surface Coating NESHAP - Recordkeeping requirements |
| FACILITY | 40CFR 63-MMMM.3930 (e) | 77 | Misc. Metal Parts and Products Surface Coating NESHAP - Recordkeeping requirements |
| FACILITY | 40CFR 63-MMMM.3930 (f) | 78 | Misc. Metal Parts and Products Surface Coating NESHAP - |

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| FACILITY | 40CFR 63-MMMM.3930 (g) | 79 | Recordkeeping requirements Misc. Metal Parts and Products Surface Coating NESHAP - Recordkeeping requirements |
| FACILITY | 40CFR 63-MMMM.3930 (k) | 80 | Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements |
| FACILITY | 40CFR 63-MMMM.3931 | 81 | Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements |
| FACILITY | 40CFR 63-MMMM.3963 (a) | 82 | Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions |
| FACILITY | 40CFR 63-MMMM.3963 (b) | 83 | Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions |
| FACILITY | 40CFR 63-MMMM.3963 (c) | 84 | Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions |
| FACILITY | 40CFR 63-MMMM.3963 (d) | 85 | Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions |
| FACILITY | 40CFR 63-MMMM.3963 (e) | 86 | Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions |
| FACILITY | 40CFR 63-MMMM.3963 (f) | 87 | Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions |
| FACILITY | 40CFR 63-MMMM.3964 (b) | 88 | Misc. Metal Parts and Products Surface Coating NESHAP - Performance test requirements |
| FACILITY | 40CFR 63-MMMM.3967 (a) | 89, 90 | Misc. Metal Parts & Products Surface Coating NESHAP - Establishing operating limits for add-on control device |
| FACILITY | 40CFR 63-MMMM.3967 (f) | 91 | Misc. Metal Parts & Products Surface Coating NESHAP - emission capture system and add-on control device |

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| FACILITY | 40CFR 63-MMMM.3968(a) | 92 | operating limits Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems |
| FACILITY | 40CFR 63-MMMM.3968(b) | 93, 94 | Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems |
| FACILITY | 40CFR 63-MMMM.3968(c) | 95, 96, 97 | Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems |
| FACILITY | 40CFR 63-MMMM.3968(g) | 98, 99, 100, 101 | Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems |
| FACILITY | 40CFR 68 | 20 | Chemical accident prevention provisions |
| FACILITY | 40CFR 82-F | 21 | Protection of Stratospheric Ozone - recycling and emissions reduction |
| FACILITY | 6NYCRR 200.6 | 1 | Acceptable ambient air quality. |
| FACILITY | 6NYCRR 200.7 | 9 | Maintenance of equipment. |
| FACILITY | 6NYCRR 201-1.4 | 105 | Unavoidable noncompliance and violations |
| FACILITY | 6NYCRR 201-1.7 | 10 | Recycling and Salvage |
| FACILITY | 6NYCRR 201-1.8 | 11 | Prohibition of reintroduction of collected contaminants to the air |
| FACILITY | 6NYCRR 201-3.2(a) | 12 | Exempt Activities - Proof of eligibility |
| FACILITY | 6NYCRR 201-3.3(a) | 13 | Trivial Activities - proof of eligibility |
| FACILITY | 6NYCRR 201-5.3(b) | 106 | Permit Content and Terms of Issuance - permit conditions |
| FACILITY | 6NYCRR 201-6 | 22, 102, 103 | Title V Permits and the Associated Permit Conditions |
| FACILITY | 6NYCRR 201-6.5(a)(4) | 14 | General conditions |
| FACILITY | 6NYCRR 201-6.5(a)(7) | 2 | General conditions |
| FACILITY | 6NYCRR 201-6.5(a)(8) | 15 | Fees |
| FACILITY | 6NYCRR 201-6.5(c) | 3 | General conditions Permit conditions for Recordkeeping and Reporting of |
| FACILITY | 6NYCRR 201-6.5(c)(2) | 4 | Compliance Monitoring Permit conditions for Recordkeeping and |

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| | | | |
|----------|--------------------------|------------|---|
| FACILITY | 6NYCRR 201-6.5(c)(3)(ii) | 5 | Reporting of Compliance Monitoring Permit conditions for Recordkeeping and Reporting of Compliance Monitoring |
| FACILITY | 6NYCRR 201-6.5(d)(5) | 16 | Compliance schedules |
| FACILITY | 6NYCRR 201-6.5(e) | 23 | Compliance Certification |
| FACILITY | 6NYCRR 201-6.5(f) | 24 | Operational flexibility |
| FACILITY | 6NYCRR 201-6.5(f)(6) | 17 | Off Permit Changes |
| FACILITY | 6NYCRR 202-1.1 | 18 | Required emissions tests. |
| FACILITY | 6NYCRR 202-1.2 | 25 | Notification. |
| FACILITY | 6NYCRR 202-1.3 | 26, 27, 28 | Acceptable procedures. |
| FACILITY | 6NYCRR 202-1.4 | 29 | Separate emission tests by the commissioner. |
| FACILITY | 6NYCRR 202-1.5 | 30 | Prohibitions. |
| FACILITY | 6NYCRR 202-2.1 | 6 | Emission Statements - Applicability |
| FACILITY | 6NYCRR 202-2.5 | 7 | Emission Statements - record keeping requirements. |
| FACILITY | 6NYCRR 211.2 | 107 | General Prohibitions - air pollution prohibited. |
| FACILITY | 6NYCRR 211.3 | 19 | General Prohibitions - visible emissions limited |
| FACILITY | 6NYCRR 212.4(a) | 31, 32 | General Process Emission Sources - emissions from new sources and/or modifications |
| FACILITY | 6NYCRR 212.4(c) | 33, 34, 35 | General Process Emission Sources - emissions from new processes and/or modifications |
| FACILITY | 6NYCRR 212.6(a) | 36, 37 | General Process Emission Sources - opacity of emissions limited |
| FACILITY | 6NYCRR 215.2 | 8 | Open Fires - Prohibitions |
| FACILITY | 6NYCRR 228.1(d) | 38 | Will remain subject |
| FACILITY | 6NYCRR 228.10 | 56 | Handling, storage and disposal of VOCs |
| FACILITY | 6NYCRR 228.3(a) | 39 | Recordkeeping, reports for VOCs |
| FACILITY | 6NYCRR 228.3(b) | 40, 41, 42 | VOC incinerator- 80% overall removal efficiency |
| FACILITY | 6NYCRR 228.3(c) | 43 | Solids as applied |
| FACILITY | 6NYCRR 228.4 | 44, 45 | Opacity |
| FACILITY | 6NYCRR 228.5(a) | 46 | VOC recordkeeping by the facility |
| FACILITY | 6NYCRR 228.5(b) | 47 | Use of Methods 311 or 24. |
| FACILITY | 6NYCRR 228.5(c) | 48 | Alternate sampling and analysis methods |



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| | | | |
|----------|----------------------|--------|--|
| FACILITY | 6NYCRR 228.5 (d) | 49 | Department Access to Obtain Samples |
| FACILITY | 6NYCRR 228.5 (e) (2) | 50 | Demonstration of other than VOC solvent recovery |
| FACILITY | 6NYCRR 228.5 (f) | 51 | Testing and monitoring; Methods 18, 25 and 25A |
| FACILITY | 6NYCRR 228.5 (g) (1) | 52, 53 | Air cleaning device exhaust gas temperature monitoring |
| FACILITY | 6NYCRR 228.5 (j) | 54 | Record of noncompliance |
| FACILITY | 6NYCRR 228.5 (k) | 55 | Records maintained for five years |

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)



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The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-5.3 (b)

Lists those contaminants subject to contaminant specific requirements

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.5 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.5 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.5 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.5 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.



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6 NYCRR 201-6.5 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.5 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.5 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.5 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68



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This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, KEYMARK CORP PLANT has been determined to be subject to the following regulations:

40 CFR 63.3890 (c) (2)

This citation requires the owner and operator to calculate and comply with a facility specific emission limit where the facility meets the applicability criteria for more than one of the subcategory emission limits in order to limit hazardous air pollutant emissions.

40 CFR 63.3891 (c)

This citation requires the owner or operator to demonstrate compliance, based on the use of emission capture systems and add on controls, with the hazardous air pollutant emission limit contained in 40 CFR 63.3890(b)(1). The citation also requires the owner or operator to demonstrate that all emission capture systems and add on controls meet the operating limits contained in 40 CFR 63.3892.

40 CFR 63.3892 (b)

This citation requires the owner or operator to establish and meet operating limits, contained in Table 1 of the regulation. The operating limits must be met at all times after they have been established. The operating limits are established during performance testing.

40 CFR 63.3893 (b)

This citation requires the owner or operator to develop and implement a work practice plan to minimize hazardous air pollutant emissions from storage, mixing, and conveying operations. The plan must contain, at a minimum, the elements contained in the regulation.

40 CFR 63.3900 (a) (2) (i)

This citation requires that the coating operation must be in compliance with the applicable emission limit at all times except during periods of startup, shutdown, or malfunction.

40 CFR 63.3900 (a) (2) (ii)

This citation requires that the coating operation must be in compliance with the operating limits for



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emission capture systems and add on control devices at all times except during periods of startup, shutdown, or malfunction.

40 CFR 63.3900 (a) (2) (iii)

This citation requires the that the coating operation must be in compliance with the work practice standards at all times.

40 CFR 63.3900 (b)

This citation requires the owner or operator to always operate and maintain the affected sources including all air pollution control and monitoring equipment in accordance with the General Requirements contained in 40 CFR 63 Subpart A, specifically 40 CFR 63.6(e)(1)(i).

40 CFR 63.3900 (c)

This citation requires the owner or operator to develop and implement a written startup, shutdown, and malfunction plan for sources that use emission capture systems and add on control devices.

40 CFR 63.3901

This requirement refers to Table 2 of the Subpart which outlines the various general requirements in 40 CFR 63 Subpart A (63.1 through 63.15)that apply to this facility

40 CFR 63.3920 (a)

This citation requires the owner or operator to submit semiannual compliance reports for each affected source.

40 CFR 63.3920 (b)

This citation requires the owner or operator to submit the reports of performance test results for emission capture systems and add on control devices no later than 60 days after the completion of such tests.

40 CFR 63.3920 (c)

This citation requires the owner or operator to submit reports for any startup, shutdown, or malfunction that occurred during the semiannual reporting period.

40 CFR 63.3930 (a)

This citation requires the owner or operator to collect and maintain a copy of each notification and report submitted to comply with 40 CFR 63 Subpart M and the documentation supporting each notification and report.

40 CFR 63.3930 (b)

This citation requires the owner or operator to collect and maintain a current copy of information provided by materials suppliers or manufacturers or test data used to determine the mass fraction of organic hazardous air pollutant and density for each coating, thinner, additive, and cleaning material, and the volume fraction of coating solids for each coating.



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40 CFR 63.3930 (c) (4)

This citation requires the owner or operator to collect and maintain, for each compliance period, the records of the calculations specified in 40 CFR 63.3930(c)(4)(i) through (v).

40 CFR 63.3930 (d)

This citation requires the owner or operator to collect and maintain a record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period.

40 CFR 63.3930 (e)

This citation requires the owner or operator to collect and maintain a record of the mass fraction of organic hazardous air pollutant for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.

40 CFR 63.3930 (f)

This citation requires the owner or operator to collect and maintain a record of the volume fraction of coating solids for each coating used during each compliance period.

40 CFR 63.3930 (g)

This citation requires the owner or operator to collect and maintain a record of the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

40 CFR 63.3930 (k)

This citation requires the owner or operator to collect and maintain the records specified in 40 CFR 63.3930(k)(1) through (8).

40 CFR 63.3931

This regulation specifies the length of time records must be kept under Subpart MMMM.

40 CFR 63.3963 (a)

This citation states that to demonstrate continuous compliance with the applicable emission limit in 40 CFR 63.3890, the organic HAP emission rate for each compliance period, determined according to the procedures in 40 CFR 63.3961, must be equal to or less than the applicable emission limit in 40 CFR 63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in 40 CFR 63.3960 is the end of a compliance period consisting of that month and the preceding 11 months.

The facility must perform the calculations in 40 CFR 63.3961 on a monthly basis using data from the previous 12 months of operation. If the facility is complying with a facility specific emission limit under 40 CFR 63.3890(c), the facility must also perform the calculation using Equation 1 in 40 CFR 63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation. establish and meet operating limits, contained in Table 1 of the regulation. The operating limits must be met at all times after they have been established. The operating limits are established during performance testing.



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40 CFR 63.3963 (b)

This citation states that if the organic hazardous air pollutant (HAP) emission rate for any twelve (12) month compliance period exceeded the applicable emission limit in 40 CFR 63.3890, this is a deviation from the emission limit for that compliance period that must be reported as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7).

40 CFR 63.3963 (c)

This citation requires the owner or operator to demonstrate continuous compliance with each operating limit required in 40 CFR 63.3892 that applies, as specified in Table 1 to Subpart MMMM, when the coating line is in operation.

If an operating parameter is out of the allowed range specified in Table 1 to Subpart MMMM, this is a deviation from the operating limit that must be reported as specified in 40 CFR 63.3910(c)(6) and 63.3920(a)(7).

If an operating parameter deviates from the operating limit specified in Table 1 to Subpart MMMM, then the facility must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation, unless the facility has other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the Administrator.

40 CFR 63.3963 (d)

This citation requires the owner or operator to meet the requirements for bypass lines in 40 CFR 63.3968(b) for controlled coating operations for which the facility does not conduct liquid-liquid material balances. If any bypass line is opened and emissions are diverted to the atmosphere when the coating operation is running, this is a deviation that must be reported as specified in 40 CFR 63.3910(c)(6) and 63.3920(a)(7). For the purposes of completing the compliance calculations specified in 40 CFR 63.3961(h), the facility must treat the materials used during a deviation on a controlled coating operations if they were used on an uncontrolled coating operation for the time period of the deviation as indicated in Equation 1 of 40 CFR 63.3961.

40 CFR 63.3963 (e)

This citation requires the owner or operator to demonstrate continuous compliance with the work practice standards in 40 CFR 63.3893. If the facility did not develop a work practice plan, or the facility did not implement the plan, or the facility did not keep the records required by 40 CFR 63.3930(k)(8), this is a deviation from the work practice standards that must be reported as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7).

40 CFR 63.3963 (f)

This citation requires the owner or operator to, as part of each semiannual compliance report required in 40 CFR 63.3920, identify the coating operation(s) for which the emission rate with add-on control option was used. If there were no deviations from the emission limitations, submit a statement that the facility was in compliance with the emission limits during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in 40 CFR 63.3890, and that the facility achieved the operating limits required by 40 CFR 63.3892 and the



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work practice standards required by 40 CFR 63.3893 during each compliance period.

40 CFR 63.3964 (b)

This citation requires the owner or operator to (1) conduct each performance test to determine the efficiency of an emission capture system according to the provisions listed in 40 CFR 63.3965 and (2) conduct each performance test to determine the efficiency of an add on control device according to the requirements listed in 40 CFR 63.3966.

40 CFR 63.3967 (a)

This citation requires the owner or operator, during the performance test required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 3965, and 3966, to establish the operating limits required by 40 CFR 63.3892 according to this condition, unless the facility received approval for alternative monitoring and operating limits under 40 CFR 63.8(f) as specified in 40 CFR 63.3892.

If the control device is a thermal oxidizer, establish the operating limits by:

- 1) During the performance test, the facility must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The facility must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.
- 2) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

40 CFR 63.3967 (f)

This citation requires the owner or operator to maintain air flow into the enclosure at all times and meet a minimum pressure drop across the permanent total enclosure.

40 CFR 63.3968 (a)

This citation requires the owner or operator to install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in 40 CFR 63.3968(c), (e), (f), and (g) according to the following provisions:

- The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. The facility must have a minimum of four equally spaced successive cycles of CPMS operation in 1 hour.
- The facility must determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation.
- The facility must record the results of each inspection, calibration, and validation check of the CPMS
- The facility must maintain the CPMS at all times and have available necessary parts for routine repairs of the monitoring equipment



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- The facility must operate the CPMS and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibrations checks and required zero and span adjustments).
- The facility must not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. The facility must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.
- A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations is a deviation from the monitoring requirements.

40 CFR 63.3968 (b)

This citation requires the owner or operator to meet the following requirements for each emission capture system that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.

The facility must monitor or secure the valve or closure mechanism controlling the bypass line in a nondiverting position in such a way that the valve or closure mechanism cannot be opened without creating a record that the valve was opened. The method used to monitor or secure the valve or closure mechanism must meet one of the requirements specified below:

- 1) FLOW CONTROL POSITION INDICATOR - install, calibrate, maintain, and operate according to manufacturer's specifications a flow control position indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to the add-on control device or diverted from the add-on control device. The time of occurrence and flow control position must be recorded, as well as every time the flow direction has changed. The flow control position indicator must be installed at the entrance to any bypass line that could divert the emissions away from the add-on control device to the atmosphere.
- 2) CAR-SEAL OR LOCK-AND-KEY VALVE CLOSURES - secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. The seal or closure mechanism must be visually inspected at least once every month to ensure that the valve is maintained in the closed position, and the emissions are not diverted away from the add-on control device to the atmosphere.
- 3) VALVE CLOSURE MONITORING - ensure that any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every 15 minutes. The monitoring system must be visually inspected at least once every month to verify that the monitor will indicate valve position.
- 4) AUTOMATIC SHUTDOWN SYSTEM - use an automatic shutdown system in which the coating operation is stopped when flow is diverted by the bypass line away from the add-on control device to the atmosphere when the coating operating is running. The automatic shutdown system must be inspected at least once every month to verify that it will detect diversions of flow and shut down the coating operation.

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5) FLOW DIRECTION INDICATOR - install, calibrate, maintain, and operate according to manufacturer's specifications a flow direction indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to or from the add-on control device. Each time the flow direction changes, the next reading of the time of occurrence and flow direction must be recorded. The flow direction indicator must be installed in each bypass line or air makeup supply line that could divert the emissions away from the add-on control device to the atmosphere.

If any bypass line is opened, the facility must include a description of why the bypass line was opened and the length of time it remained open in the semiannual compliance reports required in 40 CFR 63.3920.

40 CFR 63.3968 (c)

This citation requires the owner or operator, if using a thermal oxidizer as an add-on control device, to comply with the provisions listed in 40 CFR 63.3968(a) and 3968(c)(3)(i)-(v) which includes the following:

- 1) Install a gas temperature monitor in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs
- 2) For each gas temperature monitoring device:
 - locate the temperature sensor in a position that provides a representative temperature
 - use a temperature sensor with a measurement sensitivity of 5 degrees Fahrenheit or 1.0% of the temperature value, whichever is larger
 - before using the sensor for the first time or when relocating or replacing the sensor, perform a validation check by comparing the sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature.
 - conduct an accuracy audit every quarter and after every deviation. Accuracy audit methods include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices.
 - conduct a visual inspection of each sensor every quarter if redundant temperature sensors are not used.

40 CFR 63.3968 (g)

This citation requires the owner or operator, for each flow measurement device in a capture system monitoring system, to meet the requirements listed in 40 CFR 63.3968(a) and (g)(1)(i)-(vii) which includes:

- 1) Locate a flow sensor in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the add-on control device.
- 2) Use a flow sensor with an accuracy of at least 10% of the flow
- 3) Perform an initial sensor calibration in accordance with the manufacturer's requirements
- 4) Perform a validation check before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via



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relative accuracy testing.

5) Conduct an accuracy audit every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

6) Perform leak checks on a monthly basis.

7) Perform visual inspections of the sensor system quarterly if there is no redundant sensor.

40 CFR Part 63, Subpart A

The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40CFR63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that describe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

Section 63.1 relates to general applicability considerations both before and after promulgation of standards for a source category. Section 63.2 contains definitions common to the MACT rules. Section 63.3 contains units and abbreviations used in the MACT rules. Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. Section 63.5 describes how construction or reconstruction trigger requirements for preconstruction review.

Section 63.6 covers compliance issues such as how default new source and existing source compliance dates are calculated for each MACT rule; operation and maintenance requirements; startup, shutdown, and malfunction plan requirements; methods for determining compliance; alternative emission standards; compliance extensions; and compliance exemptions.

Section 63.7 covers performance testing requirements such as default notification and test deadlines; quality assurance programs: site-specific test plans; test facilities; general test conduct requirements; use of alternative test methods; data analysis, recordkeeping, and reporting; and performance test waivers.

Section 63.8 covers default monitoring requirements for continuous or periodic parameter monitoring, continuous opacity monitoring, and continuous emission monitoring.

Section 63.9 contains default notification requirements and deadlines for initial notifications, requests for extension of compliance, notification that a source is subject to special compliance requirements, continuous monitoring related notifications, and notifications of compliance status (also referred to as initial compliance reports).

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.



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6 NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6 NYCRR 202-1.2

This regulation specifies that the department is to be notified at least 30 days in advance of any required stack test. The notification is to include a list of the procedures to be used that are acceptable to the department. Finally, free access to observe the stack test is to be provided to the department's representative.

6 NYCRR 202-1.3

This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. Alternate methods may also be used provided they are determined to be acceptable by the department. Finally, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6 NYCRR 202-1.4

This regulation allows the department discretion to conduct separate or additional emission tests, including preparation of the testing site, at the source owner's expense, to determine compliance.

6 NYCRR 202-1.5

This rule prohibits the concealment of an emission by the use of air or other gaseous diluents (diluting agents) to achieve compliance with an emission standard which is based on the concentration of a contaminant in the gases emitted through a stack.

6 NYCRR 212.4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6 NYCRR 212.4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.



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6 NYCRR 228.1 (d)

This citation states that any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228, will remain subject to these provisions even if the annual potential to emit volatile organic compounds for the facility later falls below the thresholds set forth in this regulation.

6 NYCRR 228.10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6 NYCRR 228.3 (a)

This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

6 NYCRR 228.3 (b)

This citation requires any volatile organic compound (VOC) incinerator, used as control equipment, to be designed and operated to provide a minimum of 80 percent overall removal efficiency. It also allows an owner or operator of a facility which uses a natural gas fired VOC incinerator as a control device, to shut down the VOC incinerator from November 1st through March 31st for the purposes of natural gas conservation, provided the Department has determined that this action will not jeopardize air quality.

6 NYCRR 228.3 (c)

This citation specifies removal efficiency for an air cleaning device used as a control strategy. The air cleaning device must achieve an overall removal efficiency of the lower of 85% removal or the removal determined using the equation specified in 6 NYCRR part 228.3(c).

6 NYCRR 228.4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6 NYCRR 228.5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacture which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228, to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.



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6 NYCRR 228.5 (b)

This citation requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.

6 NYCRR 228.5 (c)

This citation allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

6 NYCRR 228.5 (d)

This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6 NYCRR 228.5 (e) (2)

This citation specifies how to evaluate control equipment other than volatile organic compound (VOC)/ solvent recovery systems, and the methods to determine removal efficiency.

6 NYCRR 228.5 (f)

6 NYCRR 228.5 (g) (1)

This requires continuous monitors measure the exhaust gas temperature of all incinerators when an air cleaning device is used.

6 NYCRR 228.5 (j)

This requires any information or record showing noncompliance with the requirements of Part 228 to be reported to Department within 30 days of generation of the information or record..

6 NYCRR 228.5 (k)

This requires all records required by this regulation to be maintained at the facility for a period of five years

Compliance Certification

Summary of monitoring activities at KEYMARK CORP PLANT:

| Location | Cond No. | Type of Monitoring |
|---------------------------|----------|--------------------|
| Facility/EU/EP/Process/ES | | |

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| | | |
|----------|-----|--|
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| FACILITY | 61 | monitoring of process or control device parameters as surrogate |
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| FACILITY | 85 | record keeping/maintenance procedures |
| FACILITY | 86 | record keeping/maintenance procedures |
| FACILITY | 87 | record keeping/maintenance procedures |
| FACILITY | 88 | record keeping/maintenance procedures |
| FACILITY | 89 | record keeping/maintenance procedures |
| FACILITY | 90 | record keeping/maintenance procedures |
| FACILITY | 91 | monitoring of process or control device parameters as surrogate |
| FACILITY | 92 | record keeping/maintenance procedures |
| FACILITY | 93 | record keeping/maintenance procedures |
| FACILITY | 94 | monitoring of process or control device parameters as surrogate |
| FACILITY | 95 | record keeping/maintenance procedures |
| FACILITY | 96 | record keeping/maintenance procedures |
| FACILITY | 97 | record keeping/maintenance procedures |
| FACILITY | 98 | record keeping/maintenance procedures |
| FACILITY | 99 | record keeping/maintenance procedures |
| FACILITY | 100 | record keeping/maintenance procedures |
| FACILITY | 101 | record keeping/maintenance procedures |
| FACILITY | 106 | monitoring of process or control device parameters as surrogate |
| FACILITY | 5 | record keeping/maintenance procedures |
| FACILITY | 23 | record keeping/maintenance procedures |
| FACILITY | 24 | record keeping/maintenance procedures |
| FACILITY | 6 | record keeping/maintenance procedures |
| FACILITY | 32 | record keeping/maintenance procedures |
| FACILITY | 33 | intermittent emission testing |
| FACILITY | 34 | record keeping/maintenance procedures |
| FACILITY | 35 | record keeping/maintenance procedures |
| FACILITY | 36 | intermittent emission testing |
| FACILITY | 37 | record keeping/maintenance procedures |
| FACILITY | 56 | record keeping/maintenance procedures |
| FACILITY | 39 | work practice involving specific operations |
| FACILITY | 40 | monitoring of process or control device parameters as surrogate |
| FACILITY | 41 | monitoring of process or control device parameters as surrogate |
| FACILITY | 42 | intermittent emission testing |

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| | | |
|----------|----|---|
| FACILITY | 44 | intermittent emission testing |
| FACILITY | 45 | record keeping/maintenance procedures |
| FACILITY | 46 | record keeping/maintenance procedures |
| FACILITY | 48 | record keeping/maintenance procedures |
| FACILITY | 51 | record keeping/maintenance procedures |
| FACILITY | 52 | monitoring of process or control device parameters as surrogate |
| FACILITY | 53 | monitoring of process or control device parameters as surrogate |
| FACILITY | 54 | record keeping/maintenance procedures |
| FACILITY | 55 | record keeping/maintenance procedures |

Basis for Monitoring

Condition 5 --- 6 NYCRR Part 201-6.5(c)(3)(ii) - This monitoring condition requires the facility to submit a semiannual report to the Department. The report shall identify all monitoring conditions and all deviations during the time period covered by the report.

Condition 6 --- 6 NYCRR Part 202-2.1 - This monitoring condition requires the facility to submit an emission statement each year. The statements are due by April 15th each year for the previous years emissions.

Condition 22 --- 6 NYCRR Part 201-6.5(e) - This monitoring condition requires the facility to submit an annual report to the Department. The report shall identify all conditions and identify the compliance status of each.

Condition 24 --- 6 NYCRR Part 201-6.5(f) - This condition contains the requirements and procedures to be used when making certain changes that meet the provisions of operational flexibility. The changes that meet the provisions of operational flexibility do not require permit modifications.

Condition 32 --- 6 NYCRR Part 212.4(a) - This monitoring condition has been included to address the emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. This condition requires the facility to perform monthly inspections of the control equipment to ensure that the control equipment is operating in accordance with the manufacturer's operating procedures, instructions, and requirements.

Condition 33 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. This condition requires the facility to perform stack testing should it be requested by the Department. The Department may request stack testing at any time.

Condition 34 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to operate the melter and holder within standard conditions and to record any overfills of the melter and holder are justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 35 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources.

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The requirement to maintain the paint booth filters and to record all maintenance activities, malfunctions, and repairs is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 36 --- 6 NYCRR Part 212.6(a) - This monitoring condition has been included to address the visible emissions requirements of 6 NYCRR Part 212 - General Process Emission Sources. This condition requires the facility to perform a Method 9 opacity evaluation should it be requested by the Department. The Department may request a Method 9 opacity evaluation at any time.

Condition 37 --- 6 NYCRR Part 212.6(a) - This monitoring condition has been included to address the visible emissions requirements of 6 NYCRR Part 212 - General Process Emission Sources. The daily monitoring frequency is justified by the fact that the rule does not specify any monitoring frequency and any visible emissions that occur are not expected to cause any exceedances. Past experience has shown that the operations contained in the process referenced in this condition are unlikely to produce visible emissions of any magnitude.

Condition 40 --- 6 NYCRR Part 228.3(a) - This monitoring condition has been included to address the volatile organic compound (VOC) emission control requirements of 6 NYCRR Part 228 - Surface Coating Processes. The facility shall maintain the records detailed in the condition, at a minimum, to show that if they operated without the emission control equipment that the coatings used did not exceed the 3.5 pounds of VOC per gallon regulatory limit for miscellaneous metal coating.

Condition 41 --- 6 NYCRR Part 228.3(b) - This monitoring condition has been included to address the volatile organic compound (VOC) emission control requirements of 6 NYCRR Part 228 - Surface Coating Processes. The facility shall maintain continuous records of the emission control (oxidizer) combustion temperature to verify that it is operating the same as it was during the most recent stack test. The results of the most recent stack test indicated the facility was in compliance with the regulations.

Condition 42 --- 6 NYCRR Part 228.3(b) - This monitoring condition has been included to address the volatile organic compound (VOC) emission control requirements of 6 NYCRR Part 228 - Surface Coating Processes. The facility shall maintain continuous records of the emission control (oxidizer) combustion temperature to verify that it is operating the same as it was during the most recent stack test. The results of the most recent stack test indicated the facility was in compliance with the regulations.

Condition 43 --- 6 NYCRR Part 228.3(b) - This monitoring condition has been included to address the volatile organic compound (VOC) emission control requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition requires the facility to perform a stack test once during the term of the permit to verify that the emission control device (oxidizer) is capable of meeting the 80 percent reduction by weight limit contained in the regulation.

Condition 45 --- 6 NYCRR Part 228.4 - This monitoring condition has been included to address the visible emissions requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition requires the facility to perform a Method 9 opacity evaluation should it be requested by the Department. The Department may request a Method 9 opacity evaluation at any time.

Condition 46 --- 6 NYCRR Part 228.4 - This monitoring condition has been included to address the visible emissions requirements of 6 NYCRR Part 228 - Surface Coating Processes. The daily monitoring frequency is justified by the fact that the rule does not specify any monitoring frequency



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and any visible emissions that occur are not expected to cause any exceedances. Past experience has shown that the operations contained in the process referenced in this condition are unlikely to produce visible emissions of any magnitude.

Condition 47 --- 6 NYCRR Part 228.5(a) - This monitoring condition has been included to address the reporting, record keeping, sampling, and analysis requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition requires the facility to maintain coating manufacturer certifications which verify the parameters used to determine the volatile organic compound (VOC) content of each coating used. The condition also requires the facility to maintain usage, purchase, etc. records on site.

Condition 49 --- 6 NYCRR Part 228.5(c) - This monitoring condition has been included to address the reporting, record keeping, sampling, and analysis requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition allows the facility to use alternative methods other than those listed in 6 NYCRR Part 228.5(b) subject to the approval of the Department.

Condition 52 --- 6 NYCRR Part 228.5(f) - This monitoring condition has been included to address the reporting, record keeping, sampling, and analysis requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition states that the facility must follow the notification, protocol and testing requirements contained in 6 NYCRR Part 202.

Condition 38 --- 6 NYCRR Part 228.5(g)(1) - This monitoring condition has been included to address the reporting, record keeping, sampling, and analysis requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition states that the facility must use a continuous monitor for the emission control (oxidizer) to record the combustion temperature.

Condition 53 --- 6 NYCRR Part 228.5(g)(1) - This monitoring condition has been included to address the reporting, record keeping, sampling, and analysis requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition states that the facility must use a continuous monitor for the emission control (oxidizer) to record the combustion temperature.

Condition 54 --- 6 NYCRR Part 228.5(j) - This monitoring condition has been included to address the reporting, record keeping, sampling, and analysis requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition states that the facility must notify the Department within thirty (30) days of the generation of any information or record showing noncompliance with the requirements of Part 228.

Condition 55 --- 6 NYCRR Part 228.5(k) - This monitoring condition has been included to address the reporting, record keeping, sampling, and analysis requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition requires the facility to maintain all records, required by Part 228, at the facility for a period of five (5) years.

Condition 56 --- 6 NYCRR Part 228.10 - This monitoring condition has been included to address the handling, storage, and disposal of volatile organic compound (VOC) requirements of 6 NYCRR Part 228 - Surface Coating Processes. This condition requires the facility to properly store, use, and dispose of coatings by using closed containers.

Condition 58 --- 40 CFR 63.3890(c)(2), Subpart M - This monitoring condition has been included to address the emission limitation requirements of 40 CFR 63, Subpart M - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to limit organic hazardous air pollutant emissions based on a twelve (12) month average rolled monthly.



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Condition 59 --- 40 CFR 63.3891(c), Subpart M MMMM - This monitoring condition has been included to address the emission limitation requirements of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to demonstrate, based on the materials used in their coating operation, that the emission reductions achieved by the emission control device meet the applicable emission limit contained in 40 CFR 63.3890.

Condition 60 --- 40 CFR 63.3892(b), Subpart M MMMM - This monitoring condition has been included to address the emission limitation requirements of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to meet an operating limit in order to demonstrate compliance. The operating limit shall be the emission control device (oxidizer) combustion temperature and shall be monitored and recorded continuously based on the shorter of the length of the paint run or three (3) hour period.

Condition 61 --- 40 CFR 63.3892(b), Subpart M MMMM - This monitoring condition has been included to address the emission limitation requirements of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to meet an operating limit in order to demonstrate that the emission capture system maintains a negative pressure. The pressure drop shall be monitored and recorded continuously.

Condition 62 --- 40 CFR 63.3892(b), Subpart M MMMM - This monitoring condition has been included to address the emission limitation requirements of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to meet an operating limit in order to demonstrate compliance. The operating limit shall be the emission control device (oxidizer) combustion temperature and shall be monitored and recorded continuously based on the shorter of the length of the paint run or three (3) hour period.

Condition 63 --- 40 CFR 63.3893(b), Subpart M MMMM - This monitoring condition has been included to address the emission limitation requirements of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to develop and implement a work practice to plan to minimize hazardous air pollutant emissions.

Condition 68 --- 40 CFR 63.3900(c), Subpart M MMMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to develop and implement a startup, shutdown, and malfunction plan.

Condition 70 --- 40 CFR 63.3920(a), Subpart M MMMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to submit semiannual reports. The reports should indicate the compliance status and note any deviations.

Condition 71 --- 40 CFR 63.3920(b), Subpart M MMMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to submit reports of performance test results for their emission control



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device no later than sixty (60) days after the completion of the tests require by 40 CFR 63.10(d)(2).

Condition 72 --- 40 CFR 63.3920(c), Subpart M MMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition states the requirements that the facility has to follow should they have a startup, shutdown, or malfunction during the semiannual reporting period.

Condition 73 --- 40 CFR 63.3930(a), Subpart M MMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to maintain a copy of all notifications and reports that are submitted to comply with 40 CFR 63, Subpart M MMM. The facility is also required to maintain copies of all associated data used to develop the notifications and reports.

Condition 74 --- 40 CFR 63.3930(b), Subpart M MMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to maintain a copy of current information provided by material suppliers or manufacturers. Such information shall include but is not limited to test data, formulation data, and additives.

Condition 75 --- 40 CFR 63.3930(c)(4), Subpart M MMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to maintain records of specific calculations on a monthly basis as required by the regulation.

Condition 76 --- 40 CFR 63.3930(d), Subpart M MMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to collect and maintain records of the name and volume of each coating, thinner, additive, and cleaning material used during each compliance period (semiannual).

Condition 77 --- 40 CFR 63.3930(e), Subpart M MMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to collect and maintain records of the mass fraction of each coating, thinner, additive, and cleaning material used during each compliance period (semiannual).

Condition 78 --- 40 CFR 63.3930(f), Subpart M MMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to collect and maintain records of the volume fraction of coating solids for each coating used during each compliance period (semiannual).

Condition 79 --- 40 CFR 63.3930(g), Subpart M MMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to collect and maintain records of the density of each coating, thinner, additive, and cleaning material used during each compliance period (semiannual).



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Condition 80 --- 40 CFR 63.3930(k), Subpart M MMMM - This monitoring condition has been included to address the general compliance requirements of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to maintain records of deviations, startups, shutdowns, malfunctions, compliance status, performance test data, etc. for each compliance period (semiannual).

Condition 82 --- 40 CFR 63.3963(a), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition states what is required to demonstrate continuous compliance with the applicable emission limit. A compliance period shall consist of twelve (12) months monitored on a monthly basis.

Condition 83 --- 40 CFR 63.3963(b), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition states that if the emission limit is exceeded for any twelve (12) month period, it is a deviation and must be reported as specified.

Condition 84 --- 40 CFR 63.3963(c), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to demonstrate continuous compliance with each applicable operating limit.

Condition 85 --- 40 CFR 63.3963(d), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to meet the requirements for by pass lines in 40 CFR 63.3968(b). If a by pass line is opened when the coating operation is running, this is considered a deviation and must be reported as such in accordance with the regulations.

Condition 86 --- 40 CFR 63.3963(e), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to demonstrate continuous compliance with the applicable work practice standards.

Condition 87 --- 40 CFR 63.3963(f), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition states what the facility must identify and/or include as part of each semiannual compliance report.

Condition 88 --- 40 CFR 63.3963(g), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to operate in accordance with their startup, shutdown, and malfunction plan during periods of startup, shutdown, and malfunction.



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Condition 89 --- 40 CFR 63.3964(a), Subpart M MMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition states the requirements for conducting each performance test required by the regulations. The performance tests must be conducted under representative operating conditions for the coating operation, capture system, and control device.

Condition 90 --- 40 CFR 63.3967(a), Subpart M MMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to establish operating limits during the performance test. The operating limit for a thermal oxidizer is the combustion temperature. The average combustion temperature during the performance test shall be the minimum operating limit for the thermal oxidizer.

Condition 91 --- 40 CFR 63.3967(a), Subpart M MMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to establish operating limits during the performance test. The operating limit for a thermal oxidizer is the combustion temperature. The average combustion temperature during the performance test shall be the minimum operating limit for the thermal oxidizer.

Condition 92 --- 40 CFR 63.3967(f), Subpart M MMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to establish operating limits. The operating limit for a permanent total enclosure (capture system) is the pressure drop across the enclosure (system). The pressure drop limit the facility is subject to is stated in the regulation.

Condition 93 --- 40 CFR 63.3968(a), Subpart M MMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to install, operate and maintain a continuous monitoring system. The purpose of the continuous monitoring system is to continuously record the combustion temperature of the thermal oxidizer.

Condition 94 --- 40 CFR 63.3968(b), Subpart M MMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to monitor or secure the valve or closure mechanism controlling the bypass line in a position such that it can not open without creating a record that the valve was opened.

Condition 95 --- 40 CFR 63.3968(b), Subpart M MMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to monitor or secure the valve or closure mechanism controlling the bypass line in a position such that it can not open without creating a record that the valve was opened. The condition contains several options available to the facility.



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Condition 96 --- 40 CFR 63.3968(c), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to perform accuracy audits every quarter and after every deviation of the temperature monitoring device in the thermal oxidizer in order to insure that the device is recording accurate temperatures.

Condition 97 --- 40 CFR 63.3968(c), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to install the temperature sensor in a specific location. The condition also states the specifications that the temperature sensor has to meet.

Condition 98 --- 40 CFR 63.3968(c), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to perform visual inspections of the temperature sensor every quarter if redundant temperature sensors are not used.

Condition 99 --- 40 CFR 63.3968(g), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to perform accuracy audits every quarter and after every deviation of the flow measurement device in the capture system monitoring system in order to insure that the device is reading accurate data.

Condition 100 --- 40 CFR 63.3968(g), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to perform leaks checks on a monthly basis for each flow measurement device in the capture system monitoring system.

Condition 101 --- 40 CFR 63.3968(g), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to install the flow measurement device in a specific location. The condition also states the specifications that the flow measurement device has to meet.

Condition 102 --- 40 CFR 63.3968(g), Subpart M MMMM - This monitoring condition has been included to address the compliance requirements for the emission rate with add-on controls option of 40 CFR 63, Subpart M MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This condition requires the facility to perform visual inspections of the flow measurement device every quarter if redundant flow measurement devices are not used.

Condition 109 --- 6 NYCRR Part 201-5.3(b) - This monitoring condition has been included to specify that the requirements of 40 CFR 63, Subpart M MMMM do not apply to Emission Unit U-00026. The emission unit currently is exempt from 40 CFR 63, Subpart M MMMM due to the limit usage of coatings in the emission unit. The condition requires the facility to keep records to verify that the emission unit will



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continue to meet the exemption contained in the regulation. The record keeping shall be performed monthly. The facility shall keep monthly and twelve (12) rolling monthly records.