

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

Facility Identification Data

Name: UTICA METAL PRODUCTS
Address: 1526 LINCOLN AVE
UTICA, NY 13502-5298

Owner/Firm

Name: UTICA METAL PRODUCTS INC
Address: 1526 LINCOLN AVE
UTICA, NY 13502-5298, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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1526 LINCOLN AVENUE
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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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

Application for Renewal 1 of Air Title V Facility.

Attainment Status

UTICA METAL PRODUCTS is located in the town of UTICA in the county of ONEIDA. 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* ATTAINMENT)	TRANSPORT REGION (NON-
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

Utica Metal Products Inc is small business with one production facility in Utica NY which operates as a metal fabrication and coating firm. Significant air emission sources include nickel and chrome plating, anodizing, alodizing, metal etching, metal cleaning and painting operations. A decorative chrome plating operation and batch vapor degreasing operation are subject to MACT requirements. Additionally, Utica Metal Products has various exempt or trivial operations under 6 NYCRR 201-3. UMP chooses the usage of 6 NYCRR 228 non-compliant coatings as authorized by a 2006 VOC RACT variance. Control of these coatings has been demonstrated to be economically unfeasible. UMP shall limit VOC emissions to 9.9 tons per year from coating operations.

Permit Structure and Description of Operations

The Title V permit for UTICA METAL PRODUCTS 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

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.

UTICA METAL PRODUCTS is defined by the following emission unit(s):

Emission unit 1BDIP1 - THIS EMISSION UNIT CONSISTS OF A BRIGHT DIPPING PROCESS. METAL PARTS ARE STRIPPED WITH SULFURIC AND NITRIC ACID IN A SERIES OF TANKS. A FUME HOOD EXHAUSTS TO A ROOF VENT.

Emission unit 1BDIP1 is associated with the following emission points (EP):
00006

It is further defined by the following process(es):

Process: DIP is located at PLATING ROOM, Building 1 - BRIGHT DIPPING PROCESS. METAL PARTS ARE STRIPPED IN SULFURIC AND NITRIC ACID IN A SERIES OF ACID BATH AND WATER RINSE TANKS.

Emission unit 1CLN01 - METAL PARTS CLEANING OPERATIONS. AN OPEN TOP VAPOR DEGREASER USING TRICHLOROETHYLENE IS USED FOR PARTS CLEANING. THE DEGREASER IS NOT EXHAUSTED THROUGH A STACK. ANY EMISSIONS ARE RELEASED WITHIN THE FACILITY DURING PARTS TRANSFER. ALTHOUGH THERE IS NO EMISSION POINT ASSOCIATED WITH THIS EMISSION UNIT, THE POTENTIAL EMISSIONS FROM THE DEGREASER ARE ACCOUNTED FOR IN THE FACILITY EMISSIONS SUMMARY. AQUEOUS SOLUTIONS STORED IN PROCESS TANKS ARE ALSO USED AND ARE EXEMPT PURSUANT TO 6NYCRR 201-3.3(c)47 AND 48.

It is further defined by the following process(es):

Process: VAP is located at PLATING ROOM, Building 1 - METAL PARTS CLEANING PROCESS. TRICHLOROETHYLENE OPEN TOP VAPOR DEGREASER USED TO CLEAN METAL PARTS. OPEN SURFACE AREA <11 SF, THEREFORE EXEMPT FROM 6 NYCRR PART 226. DEGREASER IS SUBJECT TO 6NYCRR 212 AND 40 CFR 63 SUBPART T. A COVER HAS BEEN INSTALLED TO REDUCE EMISSIONS OF TRICHLOROETHYLENE. ANY EMISSIONS FROM THIS UNIT ARE RELEASED WITHIN THE FACILITY. THE UNIT IS NOT VENTED TO THE

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007



BUILDING EXTERIOR, THEREFORE NO EMISSION POINT IS ASSOCIATED WITH THIS EMISSION UNIT. POTENTIAL EMISSIONS ARE ESTIMATED AND ACCOUNTED FOR IN THE FACILITY EMISSIONS SUMMARY. ANNUAL USAGE OF TRICHLORETHYLENE IS MONITORED AND RECORDED BY THE FACILITY FOR CALCULATION OF ACTUAL EMISSIONS.

Emission unit 1COAT1 - METAL PARTS SURFACE COATING OPERATIONS. PERMITTABLE SOURCES INCLUDE SEVEN (7) PAINT SPRAY BOOTHS. PARTS ARE AIR DRIED OR CURED IN A 0.25 MMBTU/HR NATURAL GAS-FIRED OVEN. A POWDER COATING OPERATION IS EXEMPT UNDER 6 NYCRR 201-3.2(c)(34). TWO (2) NATURAL GAS -FIRED OVENS (0.25 MMBTU/HR) ASSOCIATED WITH THE POWDER COATING AND THE SPRAYED COATING CURE OVEN ARE EXEMPT SOURCES PURSUANT TO 6 NYCRR 201-3.2(c)2.

Emission unit 1COAT1 is associated with the following emission points (EP):

00011, 00012, 00014, 00015, 00016, 00017, 00018, 00019, 00020

It is further defined by the following process(es):

Process: PSB is located at Coating Room, Building 1 - OPEN PAINT SPRAY BOOTHS. PAINT IS APPLIED TO METAL PARTS WITHIN HOODED PAINT SPRAY BOOTHS. EACH BOOTH IS INDIVIDUALLY EXHAUSTED TO THE BUILDING ROOF. THESE BOOTHS ARE ALSO SUBJECT TO 6 NYCRR 228. 3 OPEN SPRAY BOOTH ARE EQUIPPED WITH 4600 CFM RATED EXHAUST . TWO BOOTHS ARE EACH EQUIPPED WITH 2300 CFM RATED EXHAUST.

Process: WPB is located at Coating Room, Building 1 - WALK-IN PAINT BOOTHS. TWO LARGE WALK-IN BOOTHS WITH 7425 CFM RATED EXHAUST.

Emission unit 1PLATE - THIS EMISSION UNIT CONSISTS OF CHROME, NICKEL AND GOLD PLATING, ALODIZING AND ANODIZING PROCESSES. FUME HOODS COLLECT EMISSIONS FROM THE INDIVIDUAL PLATING LINES AND EXHAUST THROUGH A CENTRAL VENTILATION SYSTEM. THE CENTRAL VENTILATION SYSTEM FAN IS IDENTIFIED AS EMISSION SOURCE PLFAN AND IS INCLUDED IN EACH PROCESS.

Emission unit 1PLATE is associated with the following emission points (EP):

00002, 00004

It is further defined by the following process(es):

Process: ALD is located at PLATING ROOM, Building 1 - ALODINE LINE. METAL PARTS ARE PLATED IN A SERIES OF CHEMICAL AND RINSE TANKS. EMISSIONS ARE COLLECTED BY THE CENTRAL VENTILATION SYSTEM FAN (PLFAN).

Process: ANZ is located at PLATING ROOM, Building 1 - ANODIZING PROCESS. METAL PARTS ARE ANODIZED IN A SERIES OF TANKS USING CLEANERS, SULFURIC ACID, AND WARM AND COLD WATER RINSES. EMISSIONS ARE COLLECTED BY THE CENTRAL VENTILATION SYSTEM FAN (PLFAN).

Process: CHR is located at PLATING ROOM, Building 1 - DECORATIVE CHROME PLATING PROCESS. CHROMIUM IS PLATED AND ETCHED ONTO METAL PARTS. PLATING AND ETCHING PROCESS CONSISTS OF 12 TANKS. WARM AND COLD WATER RINSE TANKS ARE LOCATED BETWEEN EACH PLATING TANK. EMISSIONS ARE COLLECTED BY THE CENTRAL VENTILATION SYSTEM FAN (PLFAN).

Process: NKL is located at PLATING ROOM, Building 1 - NICKEL PLATING LINE. NICKEL IS PLATED AND ETCHED INTO METAL PARTS. EMISSIONS ARE COLLECTED BY THE CENTRAL VENTILATION SYSTEM FAN (PLFAN).

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

Title V/Major Source Status

UTICA METAL PRODUCTS is subject to Title V requirements. This determination is based on the following information:

Utica Metal Products holds "major" status as the facility chooses the option to emit hazardous air pollutants (HAPs) in excess of 10 tons per year of an *individual* HAP, in this case, trichloroethylene.

Program Applicability

The following chart summarizes the applicability of UTICA METAL PRODUCTS 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) for specified pollutants.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007



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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

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

SIC Code	Description
3465	AUTOMOTIVE STAMPINGS
3599	MACHINERY EXC ELECTRICAL NEC

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
3-09-011-03	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - CONVERSION COATING OF METAL PRODUCTS Anodizing Kettle
3-09-010-06	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - ELECTROPLATING OPERATIONS
3-09-060-05	FABRICATED METALS-ELECTROPLATING-ENTIRE PROCESS-CHROME FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - PORCELAIN ENAMEL/CERAMIC GLAZE SPRAYING
4-01-003-98	CERAMIC GLAZE: PLATING ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING Other Not Classified
4-01-002-05	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING TRICHLOROETHYLENE - OPEN-TOP VAPOR DEGREASING
3-04-010-99	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - NICKEL Other Not Classified
4-02-025-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Coating Operation

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007



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 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
000630-08-0	CARBON MONOXIDE		> 0 but < 2.5 tpy
007440-47-3	CHROMIUM (HAP)		> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE (HAP)		>= 10 tpy
0NY100-00-0	HAP		>= 40 tpy but < 50 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)		> 0 but < 10 tpy
007664-39-3	HYDROGEN FLUORIDE (HAP)		> 0 but < 10 tpy
007439-92-1	LEAD (HAP)		> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL (HAP)		>= 10 tpy
000078-93-3	METHYL ETHYL KETONE (HAP)		>= 10 tpy
0NY059-28-0	NICKEL (NI 059) (HAP)		> 0 but < 10 tpy
007697-37-2	NITRIC ACID		> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN		> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES		>= 2.5 tpy but < 10 tpy
007664-38-2	PHOSPHORIC ACID		> 0 but < 2.5 tpy
0NY075-00-5	PM-10		>= 2.5 tpy but < 10 tpy
001310-73-2	SODIUM HYDROXIDE		> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
007664-93-9	SULFURIC ACID		> 0 but < 2.5 tpy
000108-88-3	TOLUENE (HAP)		>= 10 tpy
000079-01-6	TRICHLOROETHYLENE (HAP)		>= 10 tpy
0NY998-00-0	VOC		>= 40 tpy but < 50 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)		> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

(a) The affirmative defense of emergency shall be demonstrated through

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

properly signed, contemporaneous operating logs, or other relevant evidence that:

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

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

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

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

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

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

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

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

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

complete.

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

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

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

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

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

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

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

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

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

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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision,

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

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)

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

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	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	67
1-PLATE/-/CHR	40CFR 63-N.340 (b)	Subpart N - Chromium Electroplating NESHAP	56
1-PLATE/-/CHR	40CFR 63-N.342 (d) (2)	Subpart N - Standards	57
1-PLATE/-/CHR	40CFR 63-N.342 (f)	Subpart N - Standards	58
1-PLATE/-/CHR	40CFR 63-N.342 (g)	Subpart N - Standards	59
1-PLATE/-/CHR	40CFR 63-N.343 (c) (5)		60
1-PLATE/-/CHR	40CFR 63-N.346 (a)	Subpart N - Recordkeeping requirements	61
1-PLATE/-/CHR	40CFR 63-N.346 (b)	Subpart N - Recordkeeping requirements	62
1-PLATE/-/CHR	40CFR 63-N.346 (c)	Subpart N - Recordkeeping requirements	63
1-PLATE/-/CHR	40CFR 63-N.347 (a)	Subpart N - Reporting requirements	64
1-PLATE/-/CHR	40CFR 63-N.347 (e) (2)	Subpart N - Reporting requirements	65
1-PLATE/-/CHR	40CFR 63-N.347 (g) (3)	Subpart N - Reporting requirements	66
1-CLN01	40CFR 63-T.460 (a)		35

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007

1-CLN01	40CFR 63-T.460(b)		36
1-CLN01	40CFR 63-T.463	Subpart T- Batch vapor and in-line machines: control combinations and idling emission limit	37
1-CLN01	40CFR 63-T.463(a)		38
1-CLN01	40CFR 63-T.463(b) (1) (i)	Halogenated Solvent Cleaner NESHAP - Batch Vapor Standards	39
1-CLN01	40CFR 63-T.463(d)		40
1-CLN01	40CFR 63-T.463(e) (2) (ii)		41
1-CLN01	40CFR 63-T.463(e) (2) (v)		42
1-CLN01	40CFR 63-T.465(d)	Subpart T- Test methods	43
1-CLN01	40CFR 63-T.465(e)	Subpart T- Test methods	44
1-CLN01	40CFR 63-T.466(d) (1)	Subpart T- Monitoring procedures	45
1-CLN01	40CFR 63-T.466(d) (1) (ii)	Subpart T- Monitoring procedures	46
1-CLN01	40CFR 63-T.467(a)	Subpart T- Recordkeeping requirements	47
1-CLN01	40CFR 63-T.467(b)	Subpart T- Recordkeeping requirements	48
1-CLN01	40CFR 63-T.467(c)	Subpart T- Recordkeeping requirements	49
1-CLN01	40CFR 63-T.468(d)	Subpart T- Reporting requirements	50
1-CLN01	40CFR 63-T.468(f)	Subpart T- Reporting requirements	51
1-CLN01	40CFR 63-T.468(g)	Subpart T- Reporting requirements	52
1-CLN01	40CFR 63-T.468(h)	Subpart T- Reporting requirements	53
1-CLN01	40CFR 63-T.468(i)	Subpart T- Reporting requirements	54
FACILITY	40CFR 68	Chemical accident prevention provisions	21
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	22
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	68
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	12
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	13
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	14
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 30, 31
FACILITY	6NYCRR 201-6.5(a) (4)	General conditions	15
FACILITY	6NYCRR 201-6.5(a) (7)	General conditions	
Fees 2			
FACILITY	6NYCRR 201-6.5(a) (8)	General conditions	16
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and	3

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007

FACILITY	6NYCRR 201-6.5 (c) (2)	Reporting of Compliance Monitoring Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5 (c) (3)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	24
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5 (d) (5)	Compliance schedules	17
FACILITY	6NYCRR 201-6.5 (e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5 (f) (6)	Off Permit Changes	18
FACILITY	6NYCRR 201-6.5 (g)	Permit shield	25
FACILITY	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	32
1-COAT1	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	55
FACILITY	6NYCRR 202-1.1	Required emissions tests.	19
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	69, 70
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	20
FACILITY	6NYCRR 212.11 (a)	Sampling and monitoring	28
1-BDIP1/00006	6NYCRR 212.4 (a)	General Process Emission Sources - emissions from new sources and/or modifications	33, 34
FACILITY	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	26
FACILITY	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	27
FACILITY	6NYCRR 215	Open Fires	9
FACILITY	6NYCRR 221.2	Prohibition.	71
1-COAT1	6NYCRR 228.3 (e)	Process specific RACT demonstrations	55
FACILITY	6NYCRR 228.4	Opacity	29

Applicability Discussion:

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

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

program for New York State.

6NYCRR Part 200-.6

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

6NYCRR Part 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

6NYCRR Part 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.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 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.

6NYCRR Part 201-3.3(a)

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.

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

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

6NYCRR Part 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.

6NYCRR 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.

6NYCRR 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.

6NYCRR 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.

6NYCRR Part 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.

6NYCRR Part 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

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.

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

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and 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.

6NYCRR Part 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.

6NYCRR 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.

6NYCRR Part 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.

6NYCRR 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.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 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.

6NYCRR Part 202-2.1

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

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

6NYCRR Part 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.

6NYCRR Part 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 Part 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 Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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, UTICA METAL PRODUCTS has been determined to be subject to the following regulations:

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

40CFR 63-N.340 (b)

This requires compliance with the general provisions which contains requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices .

40CFR 63-N.342 (d) (2)

This regulation is in place in order to reduce the emission of the hazardous air pollutant (HAP), chromium. A chemical fume suppressant is added to the plating tank and floats over the electrolyte bath. The surface tension of the bath can be adjusted by monitoring the concentration of a wetting agent (fume suppressant). This surface tension is required to not exceed 45 dynes per centimeter, doing so contains chromium emissions.

40CFR 63-N.342 (f)

This firm is required to develop and provide to the NYSDEC, a sort of user's manual, said "Operation and Maintenance (O&M) Plan" that will govern this electroplating process. The NYSDEC must review and approve/disapprove this O&M plan. Utica metal Products is then required to operate this tank within the confines of the plan.

40CFR 63-N.342 (g)

This does not allow a reducing agent to change the form of chromium from hexavalent to trivalent.

40CFR 63-N.343 (c) (5)

This regulation establishes a regime by which the maximum allowable electroplating surface tension (measured in dynes) is determined and also sets the frequency by which this level must be checked and recorded. Proper selection of surface tension parameters serves to contain chromium (a HAP) emissions.

40CFR 63-N.346 (a)

Utica Metal Products shall fulfill the recordkeeping requirements listed in Subpart A.

40CFR 63-N.346 (b)

This requirement refers specifically to chromium electroplating tanks and the usage of chemical fume suppressants, which are added to manage surface tension, which is managed to control the emission of chromium, a hazardous air pollutant (HAP). Very specific recordkeeping and reporting (to NYSDEC) doctrines are promulgated here.

40CFR 63-N.346 (c)

Utica Metal Products shall retain all records pertaining to Supart N for a period of at least five years.

40CFR 63-N.347 (a)

This requires fulfillment of all reporting requirements of Subpart N.

40CFR 63-N.347 (e) (2)

This establishes the content of the initial notification and where to sent it.

40CFR 63-N.347 (g) (3)

This requires the owner or operator of an affected source for which compliance monitoring is required to

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007



prepare an acceptable summary report to document the ongoing compliance status of the source.

40CFR 63-T.460 (a)

This reference lists the type of degreaser units which are subject to the requirements in Subpart T if they use any of the six specific solvents listed with a concentration of at least 5 % by weight.

40CFR 63-T.460 (b)

This reference states that degreaser units subject to Subpart T must meet the appropriate general requirements listed in Subpart A.

40CFR 63-T.463

This regulation outlines the control requirements for owner or operators of batch vapor and in-line cleaning machines. Among the requirements are when and how the machine is to be covered; the freeboard ratio of the cleaning tank, the need and specifications of vapor control devices and emission limits for the machines.

40CFR 63-T.463 (a)

This reference is the heading for the existing and new in-line and batch vapor solvent cleaning machine design requirements (e.g., freeboard ratio, cover, minimize drafts) which are needed to minimize solvent loss.

40CFR 63-T.463 (b) (1) (i)

This reference lists the ten control equipment options for batch vapor solvent cleaning machines with an opening of 13 square feet or less. However, other equivalent methods of control can be established.

40CFR 63-T.463 (d)

This reference is the heading to all of the required work and operational practices that existing and new in-line and batch vapor solvent cleaning machines must meet.

40CFR 63-T.463 (e) (2) (ii)

This reference provides the reduced room draft standards that must be met during each monitoring period. Also, the operating conditions which are used to meet the reduced room draft standard must be maintained continuously.

40CFR 63-T.463 (e) (2) (v)

This reference provides the dwell requirements that must be met during each monitoring period.

40CFR 63-T.465 (d)

This subdivision provides the procedure for determining the appropriate dwell time for each part or parts basket.

40CFR 63-T.465 (e)

This subdivision provides the procedure for determining the maximum possible HAP emissions, based on solvent emissions at the current rate of operation, from the facility on a yearly basis.

40CFR 63-T.466 (d) (1)

Utica Metal Products has selected Option 8 as a package of three compliance items that will keep their

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007



Batch Vapor Degreaser in compliance with Subpart T. The subject matter of 40CFR 63.466(d)(1) is Reduced Room Draft, one of Option 8's selections.

UNP shall limit air movement "windspeed" across a plane that is 6 inches above the freeboard area of the degreaser. This measurement shall be done with a digital anemometer or equivalent. Readings shall be taken at each of the four corners of this freeboard area and then averaged, not to exceed 50 feet/minute.

During initial testing ,if in order to hold 50 ft/min, UMP finds it necessary to open/close the plating room windows /doors, or to turn plating room fans on or off, then such "room parameters" will become an ongoing requirement. Allowing such an excess room air movement will logically increase air turbulence at the trichlorethylene level, causing excess trichlor emission.

Room parameters shall be checked and logged weekly (do the positioning of doors, windows and fans, etc match the original testing positions?). Windspeed (at the 6 inch freeboard level) needs to be checked and logged quarterly.

40CFR 63-T.466 (d) (1) (ii)

Utica Metal Products has selected Option 8 as a package of three compliance items that will keep their Batch Vapor Degreaser in compliance with Subpart T. The subject matter of 40CFR 63.466(d)(1) is Reduced Room Draft, one of Option 8's selections.

UNP shall limit air movement "windspeed" across a plane that is 6 inches above the freeboard area of the degreaser. This measurement shall be done with a digital anemometer or equivalent. Readings shall be taken at each of the four corners of this freeboard area and then averaged, not to exceed 50 feet/minute.

During initial testing ,if in order to hold 50 ft/min, UMP finds it necessary to open/close the plating room windows /doors, or to turn plating room fans on or off, then such "room parameters" will become an ongoing requirement. Allowing such an excess room air movement will logically increase air turbulence at the trichlorethylene level, causing excess trichlor emission.

Room parameters shall be checked and logged weekly (do the positioning of doors, windows and fans, etc match the original testing positions?). Windspeed (at the 6 inch freeboard level) needs to be checked and logged quarterly.

40CFR 63-T.467 (a)

This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for the lifetime of the machine.

40CFR 63-T.467 (b)

This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for a period of five years.

40CFR 63-T.467 (c)

This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for a period of five years.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007



40CFR 63-T.468 (d)

This reference provides the compliance report requirements for batch vapor and in-line solvent cleaning machines which are subject to this subdivision (i.e., complying with the provisions in section 63.463). For existing units, this report should have been submitted to the EPA within 150 days of the compliance date. For new units, this report must be submitted to the EPA within 150 days of startup or May 1, 1995, whichever is later.

40CFR 63-T.468 (f)

This reference provides the annual report requirements for batch vapor and in-line solvent cleaning machines which are subject to this subdivision (i.e., complying with the provisions in section 63.463). Each annual report must be submitted by February 1.

40CFR 63-T.468 (g)

This reference provides the solvent emissions report requirements for batch vapor and in-line solvent cleaning machines which are subject to this subdivision (i.e., complying with the alternative standards in section 63.464). The solvent emissions report must be submitted annually.

40CFR 63-T.468 (h)

This reference provides the exceedance report requirements for batch vapor and in-line solvent cleaning machines. An exceedance report must be submitted to the EPA on a semiannual basis, unless the EPA determines that more frequent reporting is needed or if an exceedance has occurred. If an exceedance occurs, the reporting frequency will be changed to quarterly.

40CFR 63-T.468 (i)

This reference provides the conditions that must be met in order to change the exceedance reporting frequency from quarterly, or more frequent as determined by the EPA, back to semiannually.

6NYCRR 201-7.2

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6NYCRR 212 .11 (a)

This regulation requires that various "general process emission sources" may be stack-tested to ensure that capture efficiency and/or emission rates are within a specific range.

6NYCRR 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.

6NYCRR 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 an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007



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

6NYCRR 221 .2

This regulation is in place to clearly prohibit the usage of any coating that contains asbestos.

6NYCRR 228 .3 (e)

This citation allows owners and operators of surface coating processes to operate with a lesser degree of control than required by 6 NYCRR Part 228.3 provided that a process specific reasonably available control technology (RACT) demonstration has been made to the satisfaction of the Department. Such process specific RACT demonstrations must be submitted to the administrator for approval as a revision to the State Implementation Plan and must address the technical and economic feasibility of complying with the applicable regulations.

6NYCRR 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.

Compliance Certification

Summary of monitoring activities at UTICA METAL PRODUCTS:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
1-PLATE/-/CHR	monitoring of process or control device parameters as surrogate	57
1-PLATE/-/CHR	record keeping/maintenance procedures	58
1-PLATE/-/CHR	monitoring of process or control device parameters as surrogate	60
1-PLATE/-/CHR	record keeping/maintenance procedures	61
1-PLATE/-/CHR	record keeping/maintenance procedures	62
1-PLATE/-/CHR	record keeping/maintenance procedures	63
1-PLATE/-/CHR	record keeping/maintenance procedures	66
1-CLN01	record keeping/maintenance procedures	39
1-CLN01	monitoring of process or control device parameters as surrogate	41
1-CLN01	record keeping/maintenance procedures	42
1-CLN01	monitoring of process or control device parameters as surrogate	45
1-CLN01	record keeping/maintenance procedures	46
1-CLN01	record keeping/maintenance procedures	47
1-CLN01	record keeping/maintenance procedures	48
1-CLN01	record keeping/maintenance procedures	51
1-CLN01	record keeping/maintenance procedures	52
1-CLN01	record keeping/maintenance procedures	53
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
1-COAT1	work practice involving specific operations	55



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1

05/08/2007

FACILITY	record keeping/maintenance procedures	7
FACILITY	record keeping/maintenance procedures	70
1-BDIP1/00006	record keeping/maintenance procedures	33
1-BDIP1/00006	monitoring of process or control device parameters as surrogate	34
FACILITY	monitoring of process or control device parameters as surrogate	26
FACILITY	monitoring of process or control device parameters as surrogate	27
FACILITY	record keeping/maintenance procedures	29

Basis for Monitoring

Basis for Monitoring

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

This Title V permit shall incorporate all applicable federal reporting requirements. Reports are to be submitted every six months. Deviations, non-compliance and corrective actions require notification of the NYSDEC.

6NYCRR 201-6.5(e)

This monitoring condition details information that shall be contained in compliance certifications. It also references to whom (EPA, RAPCE & BCME) certifications shall be sent. Send annually.

6NYCRR 202-2.1

This condition states that emission statements shall be submitted before April 15th for the previous calendar year.

6NYCRR 201-6.5(c)(3)

This monitoring condition states that any required monitoring be performed at a minimum of every 6 months. Deviations are to be disclosed. Send to EPA and NYSEC.

6NYCRR 212.4(c)

Specifies a particulate grain-loading standard for EUs 1-BDIP1 and 1-PLATE.

6NYCRR 212.6(a)

Specifies an opacity standard for EUs 1-BDIP1 and 1-PLATE.

6NYCRR 228.4

Specifies that observations of visible emissions be conducted for all 9 EPs of EU 1-COAT1.

6NYCRR212.4(a)

Requires that an O&M plan be developed and followed for EU 1-BDIP1. Pressure drop parameters are to be monitored, recorded and reported. Washdown program is to be promulgated.

40 CFR 63.463.(b)(1)(i)

Degreaser

EQUIPMENT STANDARDS: UMP has selected Option #8, in Table 1.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

40 CFR 63.463.(e)(2)(ii)

Degreaser

EQUIPMENT STARDARDS: UMP shall conduct monitoring of *Reduced Room Draft*.

40 CFR 63.463.(e)(2)(v)

Degreaser

EQUIPMENT STARDARDS: UMP shall conduct monitoring of *dwell time*.

40 CFR 63.466.(d)(1)

Degreaser

MONITORING: UMP shall monitor windspeed at the freeboard (6 inches above) level, shall follow prescribed measurement procedure. Monitor quarterly.

40 CFR 63.466.(d)(1)(ii)

Degreaser

MONITORING: During their initial windspeed testing (at the 6" freeboard level), if UMP needed to open/close door/windows or turn on/off fans, or etc; then such room parameters shall be maintained. UMP shall monitoring such room parameters weekly.

40 CFR 63.467(a)

Degreaser

RECORDKEEPING: Details 7 required recordkeeping topics.

40 CFR 63.467(b)

Degreaser

RECORDKEEPING: Requires that 4 types of records be kept for 5 years.

40 CFR 63.468(d)

Degreaser

REPORTING: UMP shall submit an initial statement of compliance that covers 6 topics (once, upon permit renewal issuance).

40 CFR 63.468(f)

Degreaser

REPORTING: UMP shall submit an annual report that covers 2 topics (annually).

40 CFR 63.468(g)

Degreaser

REPORTING: UMP to submit a solvent emission report annually.

40 CFR 63.468(h)

Degreaser

REPORTING: UMP shall submit an exceedence report, semi-annually.

6 NYCRR 201-7.2

CAPPING: VOC emissions from UMP coating operations shall be limited to 9.9 tons/year calculated on

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3016-00065/00009 Renewal Number: 1



05/08/2007

a 12-month rolling total basis.

40 CFR 63.342(d)(2)

Chromium Electroplating

STANDARDS: UMP chooses to control chromic acid emissions by the application of a fume suppressant applied at a rate that limits surface tension to 45 dynes/cm.

ADDITIONAL NOTE: *UMP's fume suppressant (ZeroMist R) is actually able to sufficiently control chromic acid only when applied to hold surface tension to 37.5 dynes/cm as measured with a stalagmometer.*

40 CFR 63.342(f)

Chromium Electroplating

STANDARDS: UMP is to develop, maintain and follow an *Operation and Maintenance Plan* for the chroming bath.

40 CFR 63.343(c)(5)

Chromium Electroplating

COMPLIANCE: UMP is to monitor to demonstrate *continuous compliance* via fume suppressant/foam blanket method use; hold surface tension to 45 dynes/cm.

40 CFR 63.346(a)

Chromium Electroplating

RECORDKEEPING: UMP shall fulfill the recordkeeping requirements of Subpart A (General Provisions).

40 CFR 63.346(b)

Chromium Electroplating

RECORDKEEPING: UMP shall keep records on 16 topics that are detailed here.

40 CFR 63.346(c)

Chromium Electroplating

RECORDKEEPING: UMP shall maintain all Subpart N-required records for 5 years.

40 CFR 63.347(a)

Chromium Electroplating

REPORTING: UMP shall fulfill all the reporting requirements of Subpart A (General Provisions).

40 CFR 63.347(g)(3)

Chromium Electroplating

REPORTING: UMP shall semi-annually submit Ongoing Compliance Status Summary Reports, 13 topics are to be detailed.

6 NYCRR 211.2

UMP shall develop and maintain a *complaint response procedure*.