

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

Facility Identification Data

Name: GM POWERTRAIN - MASSENA PLANT
Address: ROOSEVELTOWN RD
City: MASSENA
Zip: 13662

Owner/Firm

Name: GENERAL MOTORS CORP
City: DETROIT
State: MI Country: USA Zip: 48265
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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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

This permit modification is an administrative modification. Modification number 3 inadvertently left out some of the permit conditions from the previous permit. This permit change just adds those few conditions back into the permit.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



Attainment Status

GM POWERTRAIN - MASSENA PLANT is located in the town of MASSENA in the county of ST LAWRENCE.

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-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

The Massena casting facility makes aluminum automotive components using lost foam processes.

Permit Structure and Description of Operations

The Title V permit for GM POWERTRAIN - MASSENA 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.



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003

[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.

GM POWERTRAIN - MASSENA PLANT is defined by the following emission unit(s):

Emission unit GMCAST - This emission unit includes Module Aluminum Cast Lines #1 through #5, the HVC Line, and the Machining Centers. Sand, mullite or equivalent material may be used at any of the cast lines. Based on manufacturer's data, emission of particulate matter (i.e. silt/fines content) from use of these materials is equivalent, and will not effect the operating capacity of these cast lines.

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

00064, 00084, 00095, 00097, 00098, 00116, 00117, 00118, 00125, 00126, 00127, 00133, 00134, 00169, 63026, 63027, 63028, 72003

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

Process: CL1 is located at Building 01 - This process includes Aluminum Cast Line #1 (EP 00116) and associated Didion drum with 16 mmBTU/hr burner, Cast Line #1 Cooler/Classifier (EP 00125), and Cast Line #1 Cluster set (Box Sand Filling) Machine.

The degate saw and the box filling machine are insignificant activities per 6 NYCRR 201-6.3(d)(7)

Process: CL2 is located at Building 01 - This process includes Aluminum Cast Line #2 (EP 00117), Cast Line #2 Cooler/Classifier (EP 00126), Cast Line #2 Degate Saw, and Cast Line #2 Box (Sand) Filling Machine.

The degate saw and the box filling machine are insignificant activities per 6 NYCRR 201-6.3(d)(7)

Process: CL3 is located at Building 01 - This process includes Aluminum Cast Line #3 (EP 00118) and associated Didion Drum with 16 mmBTU/hr burner, Cast Line #3 Cooler/Classifier (EP 00127), and Cast Line #3 Cluster set (Box Sand Filling) Machine.

The degate saw and the box filling machine are insignificant activities per 6 NYCRR 201-6.3(3)(7).

Process: CL4 This process includes Aluminum cast line #4 (EP00133) and associated Didion Drm with 16 mmBTU/hr burner, cast line #4 cooler/classifier (EP 00134), and Cast Line #4 cluster set (Box Sand Filling) Machine.

The degate saw and the box filling machine are insignificant activities per 6 NYCRR 201-6.3(d)(7).

Process: CL5 is located at Building 01 - This process includes Cast Line #5 (EP 00098) and associated Didion Drum with 16 mmBTU/hr burner, Cast Line #5 Cooler/Classifier (EP 00097), and Cast Line #5 Cluster Set (Box Sand Filling) Machine.

The degate saw and the box filling machine are insignificant activities per 6 NYCRR 201-6.3(d)(7).

Process: HVC is located at Ground Floor, Building 01 - This process consists of the High Volume Cast

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



(HVC) Line and its associated sources, including the R-54 & R-55 Pouring Furnaces (EP 63027), the HVC Line #1 & #2 Furnace Pouring Ladle Stations (EP 63026 & 63028), the HVC Line Cooling Conveyor (EP 72003) the Flask Sand Filling Machine Booth (EP 00084), the HVC Line Didion Rotary Drum System (EP 00095), the HVC Line Sand Cooler/Classifier (EP 00064), and the HVC Line Incinerator #2 (EP 00169). The degate saw and cooling conveyor are insignificant activities per 6 NYCRR 201-6.3(d)(7).

Process: MAC is located at Ground Floor, Building 01 - This process consists of the Aluminum Maching Centers. These sources vent internally, use cutting fluid that lubricates and cools the cutting machines as well as suppressing particulate emissions and are considered insignificant activities per 6 NYCRR 201-6.3(d)(7). There are no requirements applicable to the aluminum machining centers.

Emission unit 1GMFAC - This emission unit comprises the facility wide services including the miscellaneous sand handling operations, heat treating ovens, boilers, and roadways.

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

00090, 00113, 00114, 00131, 00172, 00197, 00198

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

Process: HTG is located at Building 01 - This process consists of facility heat treating including the CAN-ENG heat treating ovens #1-#3 (EP 00131, 00197, 00198) and the PIFCO heat treating oven (EP 00090).

Process: PWRThis process consists of combustion devices including Process boilers #1 and #2 (EP 00113 and 00172), and two backup boilers (EP 00114).

Process: RDWThis process consists of the facility roadways.This source is an insignificant activity per 6 NYCRR 201-6.3(d)(7).

Process: SND is located at Ground Floor, Building 01 - This process consists of the sand truck dump and multiple sand/debris piles. These sources are insignificant activities per 6 NYCRR 201-6.3(d)(7).

Emission unit GMMOLD - This emission unit comprises the molding operations including bead expansion and cast line molding. Each bead expander vents to a carbon canister for in plant odor control. These carbon canisters are not required by any applicable federal or state requirement. The mold aging ovens can be used for several fuctions. The primary function is to reduce the amount of pentane in the foam patterns that will be used in the cast lines. The secondary function of the aging ovens is to "reduce" off-spec beads for disposal. This process removes all the pentane in the beads, and thus reduces the bead volume, making handling and disposal easier. The pentane emissions from either of these processes are equivalent. Polystyrene beads containing trace amounts of bromine may be used at the facility. A previous Air-guide 1 modeling analysis indicates that the trace amounts of Bromine and Hydrogen Bromide emitted from the use of these beads will not exceed Air Guide 1 guideline concentrations at or beyond the fenceline.

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

00069, 00070, 00071, 00100, 00103, 00104, 00105, 00106, 00107, 00108, 00109, 00119, 00120, 00121, 00122, 00123, 00124, 00130, 00135, 00136, 00137, 00138, 00139, 00140, 00141, 00142, 00143, 00144, 00145, 00146, 00147, 00148, 00149, 00150, 00151, 00152, 00170, 00171, 00173, 00174, 00175, 00176, 00177, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00187, 00188, 00189, 00190

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

Process: BE1 is located at Ground Floor, Building 01 - This process consists of the facility's bead

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



expansion operations, including bead pre-expanders #1-4, bead screener, pentane reduction chambers #1-4 (EP 00100, 00130, 00170, 00171), & bead storage/aging hoppers. The bead storage/aging hoppers are insignificant activities per 6 NYCRR 201-6.3(d)(7).

Process: CLM is located at Building 01 - This process includes Module Drying Ovens #11-#13 (EP 00119, 00120, 00121), Module Drying Ovens #14 (EP 00122), Module Aging Oven #15 (EP00123), Module Drying Oven #16 (EP 00124), Module Aging Ovens #17-#32 (EP 00135-00150), Module Drying Ovens #33-#34 (EP 00151-00152), Module Drying Ovens #35-#36 (EP 00173-00174), Module Drying Ovens #37-#39 (EP 00175-00177), Module Mold Machines P17-P19, Module Mold Machine #4, Module Mold Machines 13D-16D, Module Mold Machines #9-#18, Module Aging Ovens #40-#49 (EP 00178-00187), and Module Drying Ovens #50-#52 (EP 00187-00190). Foam Tie-bar Cutters #1-#8.

There are no requirements applicable to the sources in this process. All sources in this process are insignificant activities per 6 NYCRR 201-6.3(d)(7).

Process: FTC is located at ground floor, Building 01 - This process includes foam tie-bar cutters #1- #8.

Process: HLM is located at Ground Floor, Building 01 - This process consists of the high volume cast line (HVCL) molding operations, including the HVC Line Mold Machines 9D-12D and 17D-24D, HVC Line #2 Pattern Cluster Assembly Machine (EP 00071), HVC Line Drying Ovens #1-3 (EP00103, 00104 and 00108), HVC Line Mold Drying Oven, HVC Line 2.2L Drying Oven, HVC Line Aging Ovens #1-3 (EP00105, 00106, 00107), HVC Line Pattern Aging Ovens (EP 00069 and 00070), and HVC Line Prototype Part Development Drying Oven (EP00109).

Emission unit GMMELT - This emission unit comprises the aluminum melting operations including the aluminum reverberatory furnaces, jet melter dross bins and SNIF units.

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

00028, 00029, 00030, 00031, 00079, 00080, 00129, 00132, 00153, 00154, 00155, 00156, 00157, 00158, 00159, 00160, 00167, 00191, 00192, 00193, 00194, 00195, 00196

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

Process: ME1 is located at Ground Floor, Building 01 - This process includes the facility's induction furnaces (EP 00059 and 00060) used to melt aluminum.

Process: ME2 is located at Ground Floor, Building 01 - This process includes the aluminum reverberatory furnaces (EPs 00028, 00029, and 00079 for source ME202; EPs 00030, 00031, and 00080 for source ME203; EPs 00155, 00156, and 00157 for ME204; EPs 00158, 00159, and 00160 for ME 205; EPs 00191, 00192 and 00193 for ME 206; and EPs 00194, 00195, and 00196 for ME 207).

Process: ME3 is located at Ground Floor, Building 01 - This process includes the Aluminum Jet Melter (EP00153, 00154, 00167).

Process: ME5 is located at Ground Floor, Building 01 - This process includes the SNIF units 1-4 (EP 00129 for ME503 and 00132 for ME504), ladle dross pot, and dross bins. The ladle dross bins is an insignificant activity per 6 NYCRR 201-6.3(d)(7).

Title V/Major Source Status

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



GM POWERTRAIN - MASSENA PLANT is subject to Title V requirements. This determination is based on the following information:

The facility has emissions above Title V major source thresholds for the following contaminants;

- PM-10
- Particulates
- Carbon Monoxide
- Volatile Organic Compounds
- Hazardous Air Pollutants
- Styrene
- Hydrogen Chloride

Program Applicability

The following chart summarizes the applicability of GM POWERTRAIN - MASSENA 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)	NO
NSPS	YES
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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

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

SIC Code	Description
3365	ALUMINUM FOUNDRIES

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
1-03-007-99	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - PROCESS GAS Other Not Classified
3-03-008-34	PRIMARY METAL PRODUCTION PRIM METAL PROD-IRON PROD (SEE 3-03-015 INTEGRATED IRON & STEEL MACT)
3-03-009-26	Paved Roads: All Vehicle Types PRIMARY METAL PRODUCTION PRIM METAL PROD-STEEL MFG(SEE 303015 FOR INTEGRATED IRON & STEEL MACT)
3-03-005-03	PRIMARY METAL PRODUCTION (STEEL) - ELECTRIC INDUCTION FURNACE PRIMARY METAL PRODUCTION PRIMARY METAL PRODUCTION - PRIMARY COPPER SMELTING Reverberatory Smelting Furnace after Roaster
3-04-001-12	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Annealing Furnace
3-04-001-07	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Hot Dross Processing
3-04-001-99	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Other Not Classified
3-04-001-15	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM SECONDARY METAL PROD:SEC ALUMINUM PRODUCTION:SWEATING FURNACE-GRATE
3-04-001-32	SECONDARY METAL PRODUCTION

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003

	SECONDARY METAL PRODUCTION - ALUMINUM
	SECONDARY METAL PROD:SECONDARY ALUMINUM PROD:RAW MATERIAL STORAGE
3-04-001-03	SECONDARY METAL PRODUCTION
	SECONDARY METAL PRODUCTION - ALUMINUM
3-04-001-01	Smelting Furnace/Reverberatory
	SECONDARY METAL PRODUCTION
	SECONDARY METAL PRODUCTION - ALUMINUM
3-04-003-50	Sweating Furnace
	SECONDARY METAL PRODUCTION
	SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
	Sand Grinding/Handling
3-04-050-99	SECONDARY METAL PRODUCTION
	SECONDARY METAL PRODUCTION - MISCELLANEOUS CASTING FABRICATING
	Other Not Classified
3-04-007-04	SECONDARY METAL PRODUCTION
	SECONDARY METAL PRODUCTION - STEEL FOUNDRIES
	Heat Treating Furnace

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 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
000098-83-9	ALPHA-METHYLSTYRENE		>= 2.5 tpy but < 10 tpy
000071-43-2	BENZENE (HAP)		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	399600	
000100-41-4	ETHYLBENZENE (HAP)		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 40 tpy but < 50 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)		>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE (HAP)		> 0 but < 10 tpy

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



007439-92-1	LEAD (HAP)	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	199800
0NY075-00-0	PARTICULATES	399600
0NY075-00-5	PM-10	399600
000100-42-5	STYRENE (HAP)	>= 10 tpy
007446-09-5	SULFUR DIOXIDE	> 0 but < 2.5 tpy
000108-88-3	TOLUENE (HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	199600

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Sealing - 6NYCRR Part 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

operate such device effectively.

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

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

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

Item E: 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 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

contained in any applicable requirement.

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

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

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

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

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

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

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item K: 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 L: 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 M: 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 N: 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 O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



such records directly to the Administrator along with a claim of confidentiality.

Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR 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 Q: 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 R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

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

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Item T: 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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

Item U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

Item W: 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

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 X: 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 permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

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 Y: Required Emission Tests - 6 NYCRR Part 202-1.1

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

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Item AA: Open Fires - 6 NYCRR Part 215

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

Item BB: 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

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 CC: 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

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	Regulation	Short Description	Condition
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New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



Facility/EU/EP/Process/ES

FACILITY	ECL 19-0301.	Powers and Duties of the Department with respect to air pollution control	2-6
1-GMFAC/-/PWR/PWR02	40CFR 60-A.12	General provisions - Circumvention	65
1-GMFAC/-/PWR/PWR02	40CFR 60-A.14	General provisions - Modification	66
1-GMFAC/-/PWR/PWR02	40CFR 60-A.4	General provisions - Address	69
1-GMFAC/-/PWR/PWR02	40CFR 60-A.7 (a)	Notification and Recordkeeping	62
1-GMFAC/-/PWR/PWR02	40CFR 60-A.7 (b)	Notification and Recordkeeping	63
1-GMFAC/-/PWR/PWR02	40CFR 60-A.9	General provisions - Availability of information	64
1-GMFAC/-/PWR/PWR02	40CFR 60-Dc.48c (a)	Reporting and Recordkeeping Requirements.	67
1-GMFAC/-/PWR/PWR02	40CFR 60-Dc.48c (g)	Reporting and Recordkeeping Requirements.	3-22
FACILITY	40CFR 68.	Chemical accident prevention provisions	3-19
FACILITY	40CFR 82-F.	Protection of Stratospheric Ozone - recycling and emissions reduction	3-20, 3-21
FACILITY	6NYCRR 200.1	Definitions.	1
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	2-7
FACILITY	6NYCRR 201-3.2 (b)	Exempt Activities - maintenance of control equipment	13
FACILITY	6NYCRR 201-3.3 (b)	Trivial Activities - maintenance of control equipment	15
FACILITY	6NYCRR 201-6.	Title V Permits and the Associated Permit Conditions	28, 57, 58
FACILITY	6NYCRR 201-6.5 (c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	2-1
FACILITY	6NYCRR 201-6.5 (c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	2-2
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3-1
FACILITY	6NYCRR 201-6.5 (e)	Compliance Certification	3-2
FACILITY	6NYCRR 201-6.5 (g)	Permit shield	3-3
FACILITY	6NYCRR 201-7.2 (a)	Emission capping using synthetic minor permits - application criteria	32, 3-10, 3-7, 3-8, 3-6, 3-9, 3-4,

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



			3-5,
			3-11,
			3-12
G-MCAST/-/CL1	6NYCRR 201-7.2(a)	Emission capping using	3-23,
		synthetic minor permits -	3-24,
		application criteria	3-25
G-MCAST/-/CL2	6NYCRR 201-7.2(a)	Emission capping using	3-26,
		synthetic minor permits -	3-27,
		application criteria	3-28
G-MCAST/-/CL3	6NYCRR 201-7.2(a)	Emission capping using	3-32,
		synthetic minor permits -	3-30,
		application criteria	3-31
G-MCAST/-/CL4	6NYCRR 201-7.2(a)	Emission capping using	3-33,
		synthetic minor permits -	3-34,
		application criteria	3-35
G-MCAST/-/CL5	6NYCRR 201-7.2(a)	Emission capping using	3-38,
		synthetic minor permits -	3-36,
		application criteria	3-37
G-MCAST/-/HVC/HVC10	6NYCRR 201-7.2(a)	Emission capping using	3-39
		synthetic minor permits -	
		application criteria	
FACILITY	6NYCRR 202-1.2	Notification.	43
FACILITY	6NYCRR 202-1.3(a)	Acceptable procedures -	44
		reference methods	
FACILITY	6NYCRR 202-2.1	Emission Statements -	45
		Applicability	
FACILITY	6NYCRR 202-2.4	Emission Statement -	46
		methods and procedures	
FACILITY	6NYCRR 202-2.5	Emission Statements -	47
		record keeping	
		requirements.	
FACILITY	6NYCRR 211.2	General Prohibitions -	142
		air pollution	
		prohibited.	
G-MCAST/-/CL1/CL101	6NYCRR 212.11	Sampling and monitoring	4-1
G-MCAST/-/CL2/CL201	6NYCRR 212.11	Sampling and monitoring	3-29
G-MCAST/-/CL3/CL301	6NYCRR 212.11	Sampling and monitoring	4-2
G-MCAST/-/CL4/CL401	6NYCRR 212.11	Sampling and monitoring	4-3
G-MCAST/-/CL5/CL501	6NYCRR 212.11	Sampling and monitoring	4-4
G-MCAST/-/HVC/HVC06	6NYCRR 212.11	Sampling and monitoring	4-5
G-MCAST/-/HVC/HVC07	6NYCRR 212.11	Sampling and monitoring	4-6
FACILITY	6NYCRR 212.11(a)	Sampling and monitoring	50
FACILITY	6NYCRR 212.4(a)	General Process Emission	3-13,
		Sources - emissions from	3-40
		new sources and/or	
		modifications	
FACILITY	6NYCRR 212.4(c)	General Process Emission	3-16,
		Sources - emissions from	3-14,
		new processes and/or	3-15
		modifications	
FACILITY	6NYCRR 212.5(f)	Applicable emission	49
		standards	
FACILITY	6NYCRR 212.6(a)	General Process Emission	3-18,
		Sources - opacity of	3-17
		emissions limited	
FACILITY	6NYCRR 221.2	Prohibition.	143
FACILITY	6NYCRR 225-1.8(a)	Reports, sampling and	52
		analysis.	
FACILITY	6NYCRR 226.2	General Requirements.	53
FACILITY	6NYCRR 226.3(a)	Cold cleaning degreasing	54
FACILITY	6NYCRR 226.4(a)	Operating Requirements.	55
1-GMFAC/-/PWR	6NYCRR 227-1.3(a)	Smoke Emission	61
		Limitations.	

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

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 program for New York State.

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 201-6

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 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 including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

required by the permit.

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 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 202-2.1

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.

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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



Facility Specific Requirements

In addition to Title V, GM POWERTRAIN - MASSENA PLANT has been determined to be subject to the following regulations:

40CFR 60-A.12

This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40CFR 60-A.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40CFR 60-A.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Enforcement and Compliance Assurance.

40CFR 60-A.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40CFR 60-A.7 (b)

This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40CFR 60-A.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

40CFR 60-Dc.48c (a)

This regulation requires the owner and operator of each affected facility to submit notification of the date of construction or reconstruction, anticipated startup, and actual startup of the facility. The notification must include the following information:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4



08/11/2003

40CFR 60-Dc.48c (g)

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

6NYCRR 200 .1

This section contains a definition of terms referred to throughout New York's entire codes, rules and regulations.

6NYCRR 201-3.2 (b)

The owner and/or operator of any emission source or unit that is eligible to be exempt on the basis of the use of appropriate emission control devices shall operate and maintain such devices in a manner consistent with good engineering practices. Failure to do so constitutes a violation of this Part.

6NYCRR 201-3.3 (b)

The owner and/or operator of any emission source or unit that is eligible to be considered as a trivial source on the basis of the use of appropriate emission control devices shall operate and maintain such devices in a manner consistent with good engineering practices. Failure to do so constitutes a violation of this Part.

6NYCRR 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 201-7.2 (a)

This regulation specifies the information that needs to be included in any application for a synthetic minor permit. This is a state facility permit which contains federally enforceable permit conditions which restrict emissions from an air contamination source in order to avoid Title V and possibly other applicable requirements.

6NYCRR 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.

6NYCRR 202-1.3 (a)

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. In addition, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003



6NYCRR 202-2.4

This regulation specifies that any required emission statement must be submitted to the Department before April 15 each year for emissions of the previous calendar year. The regulation also establishes a set of acceptable emissions estimation methods that may be used including the use of monitoring methods, if accepted by the department, and the transmittal of the emission statement information to the Department. Finally, such information may be designated as confidential, as per department approval, except for the following information: emissions, estimated emissions method, and the Source Classification Code.

6NYCRR 212 .11

This section sets the requirements for sampling, monitoring, recordkeeping, and reporting from process sources.

6NYCRR 212 .11 (a)

A facility that must show compliance with the emission limits of this part must comply with the notification and capture efficiency and/or stack testing requirements of part 202.

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 a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .5 (f)

Owners and/or operators that have established annual emission limits to satisfy other requirements must continue to meet these other requirements.

6NYCRR 212 .6 (a)

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

6NYCRR 221 .2

No one is allowed to spray coat anything with asbestos or asbestos containing materials.

6NYCRR 225-1.8 (a)

Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 226 .2

This reference provides the general requirements that owners and operators of solvent metal cleaning



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003

machines must comply with in addition to the other applicable requirements in this part. The general requirements include the proper storage, transfer, and disposal of solvents, the integrity of the equipment must be maintained, a summary of the operating procedures must be displayed, covers are to be closed when a degreaser is not used, and a record of solvent consumption must be maintained for one year.

6NYCRR 226.3 (a)

This reference requires cold cleaning degreasers to have a cover, internal drainage system and a control system to limit VOC emissions from the unit unless the solvent being used has a low vapor pressure or the solvent is not heated above a specific temperature. A water blanket that lays on top of the solvent in the degreaser or a unit that is designed so that the height of the unit is much greater than the width of the opening, which will minimize VOC emissions, are considered acceptable methods of controlling VOC emissions.

6NYCRR 226.4 (a)

This reference requires cold cleaning degreasers to have a system in place which allows the solvent on cleaned parts to drain for at least 15 seconds, or until dripping ceases, prior to removing the parts from the unit. This operating requirement will reduce the amount of VOCs that are carried out of the unit.

6NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 40% opacity for any time period; or 20% opacity for a period of 3 or more minutes during any continuous 60-minute period.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Short Description	Regulation
G-MCAST/-/HVC/HVC10	Prevention of Significant Deterioration	40CFR 52-A.21
Reason: The installation of the more efficient cooler/classifier HVC10 in place of HVC08 requires emissions caps in order to avoid PSD applicability. Emissions of PM-10 are limited to 5.0 tons per year and PM emissions are limited to 1.0 tons per year. HVC08 will have to be shut down in order to install the new cooler/classifier HVC10.		
G-MCAST/-/HVC/HVC10	New Source Review in Nonattainment Areas and Ozone Transport Region	6NYCRR 231-2.
Reason: The installation of the more efficient cooler/classifier HVC10 in place of HVC08 requires emissions caps in order to avoid NSR applicability. Emissions of VOC are limited to 1.0 tons per year. HVC08 will have to be shut down in order to install the new cooler/classifier HVC10.		

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00004/00135 Modification Number: 4

08/11/2003

applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at GM POWERTRAIN - MASSENA PLANT:

Table with 3 columns: Location Facility/EU/EP/Process/ES, Type of Monitoring, and Cond No. It lists various monitoring procedures and their corresponding condition numbers.

Basis for Monitoring

Condition 1-4: The emission of particulates from these sources were capped to prevent PSD applicability when the modification was done.

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Permit Review Report

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08/11/2003