

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 6-4058-00004/00135    Renewal Number: 1**



**03/19/2007**

**Facility Identification Data**

Name: GM POWERTRAIN - MASSENA PLANT  
Address: ROOSEVELTOWN RD  
MASSENA, NY 13662

**Owner/Firm**

Name: GENERAL MOTORS CORP  
Address: 300 RENAISSANCE CTR  
M C 482 C29 B24  
DETROIT, MI 48265-3000, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

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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.

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Summary Description of Proposed Project

THIS APPLICATION FOR A TITLE V RENEWAL PERMIT INCLUDES ALL SOURCES AT THE FACILITY. ADDITIONALLY, GM IS MODIFYING THE CONTROL DEVICES ON CAST LINES #1 TO #5. THE MODIFICATIONS INCLUDE, FOR EACH CAST LINE (CL 101, CL102, CL103, CL104 AND CL105), INSTALLING A LARGER EXHAUST FAN, USING LARGER BAGS IN THE ASSOCIATED BAGHOUSE TO MAINTAIN THE AIR TO CLOTH RATIO, AND USING LONGER CATALYST MODULES TO MAINTAIN RESIDENCE TIME. THE MODIFICATIONS ALSO INCLUDE, FOR EACH SAND COOLER/CLASSIFIER (CL102, CL202, CL302, CL402 AND CL502), REPLACING THE EXISTING EXHAUST FAN WITH THE EXISTING FAN FROM THE CAST LINE. THESE MODIFICATIONS WILL NOT INCREASE THE EMISSION OF ANY POLLUTANTS CURRENTLY EMITTED, NOR RESULT IN THE EMISSION OF ANY NEW POLLUTANTS. FURTHER, MODELED AMBIENT CONCENTRATIONS BEYOND THE FACILITY FENCE LINE WILL ONLY DECREASE AS A RESULT OF THE INCREASED STACK EXIT VELOCITY AND AIRFLOW.

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* (NON-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.

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**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.

[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 GMLAST - CASTING OPERATIONS: THIS EMISSION UNIT INCLUDES MODULE ALUMINUM CAST LINES #1 THROUGH #5, THE HVC LINE AND THE MACHINING CENTERS.

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

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 GROUND FLOOR, Building 01 - THIS PROCESS INCLUDES ALUMINUM CAST LINE #1 (EP 00116) AND ASSOCIATED ROTARY DRUM WITH 16 MMBTU/HR BURNER, CAST LINE #1 COOLER/CLASSIFIER (EP 00125), AND CAST LINE #1 CLUSTER SET MACHINE. THE CLUSTER SET MACHINE IS AN INSIGNIFICANT ACTIVITY PER 6 NYCRR 201- 6.3(d)(7).

Process: CL2 is located at GROUND FLOOR, Building 01 - THIS PROCESS INCLUDES ALUMINUM CAST LINE #2 (EP 00117) AND ASSOCIATED ROTARY DRUM WITH 16 MMBTU/HR BURNER, CAST LINE #2 COOLER/CLASSIFIER (EP 00126) AND CAST LINE #2 CLUSTER SET MACHINE. THE CLUSTER SET MACHINE IS AN INSIGNIFICANT ACTIVITY PER 6 NYCRR 201- 6.3(d)(7).

Process: CL3 is located at GROUND FLOOR, Building 01 - THIS PROCESS INCLUDES

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ALUMINUM CAST LINE #3 (EP 00118) AND ASSOCIATED ROTARY DRUM WITH 16 MMBTU/HR BURNER, CAST LINE #3 COOLER/CLASSIFIER (EP 00127), AND CAST LINE #3 CLUSTER SET MACHINE. THE CLUSTER SET MACHINE IS AN INSIGNIFICANT ACTIVITY PER 6 NYCRR 201-6.3(d)(7).

Process: CL4 is located at GROUND FLOOR, Building 01 - THIS PROCESS INCLUDES ALUMINUM CAST LINE #4 (EP00133) AND ASSOCIATED ROTARY DRUM WITH 16 MMBTU/HR BURNER, CAST LINE #4 COOLER/CLASSIFIER (EP00134), AND CAST LINE #4 CLUSTER SET MACHINE. THE CLUSTER SET MACHINE IS AN INSIGNIFICANT ACTIVITY PER 6 NYCRR 201- 6.3(d)(7).

Process: CL5 is located at GROUND FLOOR, Building 01 - THIS PROCESS INCLUDES CAST LINE #5 (EP 00098) AND ASSOCIATED ROTARY DRUM WITH 16 MMBTU/HR BURNER, CAST LINE #5 COOLER/CLASSIFIER (EP00097), AND CAST LINE #5 CLUSTER SET MACHINE. THE CLUSTER SET MACHINE IS AN INSIGNIFICANT ACTIVITY 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 (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 ROTARY DRUM SYSTEM (EP 00095), THE HVC LINE SAND COOLER/CLASSIFIER (EP 00084), AND THE HVC LINE CATALYTIC OXIDIZER #2 (EP 00169). THE COOLING CONVEYOR IS AN INSIGNIFICANT ACTIVITY PER 6 NYCRR 201-6.3(d)(7).

Process: MAC is located at GROUND FLOOR, Building 01 - THIS PROCESS CONSISTS OF THE ALUMINUM MACHINING 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 GMMELT - THIS EMISSION UNIT COMPRISES THE ALUMINUM MELTING OPERATIONS INCLUDING THE ALUMINUM REVERBERATORY FURNACES, DRY HEARTH FURNACE, 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

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

Process: ME2 is located at GROUND FLOOR, Building 01 - THIS PROCESS INCLUDES THE ALUMINUM REVERBERATORY FURNACES R-7, R-8, R-9 AND R-10 AND THE DRY HEARTH FURNACE (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; AND EPS 00191, 00192 AND 00193 FOR ME206).

Process: ME3 is located at GROUND FLOOR, Building 01 - THIS PROCESS INCLUDES THE ALUMINUM JET MELTER (EP00152, 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).

Emission unit GMMOLD - THIS EMISSION UNIT COMPRISES THE MOLDING OPERATIONS

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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 FUNCTIONS. 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.

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

00100, 00103, 00104, 00105, 00106, 00109, 00130, 00135, 00136, 00137, 00138, 00139, 00140, 00141, 00142, 00143, 00144, 00145, 00146, 00147, 00148, 00149, 00150, 00151, 00152, 00170, 00173, 00174, 00175, 00176, 00177, 00178, 00188

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 EXPANSION OPERATIONS, INCLUDING BEAD PRE-EXPANDERS #1-3, BEAD SCREENER, PENTANE REDUCTION CHAMBERS #1-3 (EP 00100,00130, 00170), & BEAD STORAGE/AGING HOPPERS. THE BEAD SCREENER AND STORAGE/AGING HOPPERS ARE INSIGNIFICANT ACTIVITIES PER 6 NYCRR 201-6.3(d)(7).

Process: CLM is located at GROUND FLOOR, Building 01 - THIS PROCESS INCLUDES MODULE DRYING OVENS #1-#6 (EP 00151, 00152, 00173, 00174, 00175, 00177), MODULE AGING OVENS #1-16 (EP00135, 00136, 00137, 00138, 00139, 00140, 00141, 00142, 00143, 00144, 00145, 00146, 00147, 00148, 00149, 00150), MODULE MOLD MACHINES P1-P19. THERE ARE NO REQUIREMENTS APPLICABLE TO THE SOURCES IN THIS PROCESS. ALL SOURCES IN THE 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-#7. 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: 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 #1-#12, HVC LINE AGING/DRYING OVENS #1-8 (EP00103, 00104, 00105, 00106, 00109, 00176, 00178, 00188).

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, 00131, 00172

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

Process: HTG is located at GROUND FLOOR, Building 01 - THIS PROCESS CONSISTS OF FACILITY HEAT TREATING INCLUDING THE CAN-ENG HEAT TREATING OVEN #1 (EP00131) AND THE PIFCO HEAT TREATING OVEN (EP00090).

Process: PWR is located at GROUND FLOOR, Building 01 - THIS PROCESS CONSISTS OF COMBUSTION DEVICES INCLUDING PROCESS BOILERS #1 AND #2 (EP00113 AND 00172).

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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).

**Title V/Major Source Status**

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

**Program Applicability**

The following chart summarizes the applicability of GM POWERTRAIN - MASSENA PLANT with regards to the principal air pollution regulatory programs:

<b>Regulatory Program</b>	<b>Applicability</b>
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	NO
SIP	YES

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**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.

**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

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bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

### Compliance Status

Facility is in compliance with all requirements

### SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or 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)
3-04-001-12	Paved Roads: All Vehicle Types 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

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	SECONDARY METAL PRODUCTION - ALUMINUM
	SECONDARY METAL PROD:SECONDARY ALUMINUM PROD:RAW MATERIAL STORAGE
3-04-001-03	SECONDARY METAL PRODUCTION
	SECONDARY METAL PRODUCTION - ALUMINUM
	Smelting Furnace/Reverberatory
3-04-001-01	SECONDARY METAL PRODUCTION
	SECONDARY METAL PRODUCTION - ALUMINUM
	Sweating Furnace
3-04-003-50	SECONDARY METAL PRODUCTION
	SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
	Sand Grinding/Handling

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 of 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
007726-95-6	BROMINE		> 0 but < 2.5 tpy
000630-08-0	CARBON MONOXIDE	401250	
000100-41-4	ETHYLBENZENE (HAP)		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP	49800	
010035-10-6	HYDROGEN BROMIDE		> 0 but < 2.5 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)		> 0 but < 10 tpy
007664-39-3	HYDROGEN FLUORIDE (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	199800	
0NY075-00-0	PARTICULATES	409120	
0NY075-00-5	PM-10	413610	
000100-42-5	STYRENE (HAP)	19800	
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy



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000108-88-3    TOLUENE (HAP)    > 0 but < 10 tpy  
0NY998-00-0    VOC    207300

**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 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

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than eighteen months, prior to the date of permit expiration for permit renewal purposes.

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

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

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

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

**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

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permit shall continue to be valid.

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

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

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

**Item K:            Reopening for Cause - 6 NYCRR Part 201-6.5(i)**

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

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required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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

**Item L:**

**Permit Exclusion - ECL 19-0305**

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

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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**

**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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>	<b>Condition</b>
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	76
FACILITY	40CFR 52-A.21	Prevention of Significant Deterioration	30, 36, 37
G-MCAST/-/CL1	40CFR 52-A.21	Prevention of Significant Deterioration	59, 60
G-MCAST/-/CL2	40CFR 52-A.21	Prevention of Significant Deterioration	62, 63
G-MCAST/-/CL3	40CFR 52-A.21	Prevention of Significant Deterioration	64, 65

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G-MCAST/-/CL4	40CFR 52-A.21	Deterioration Prevention of Significant Deterioration	68, 69
G-MCAST/-/CL5	40CFR 52-A.21	Prevention of Significant Deterioration	71, 72
G-MCAST/-/HVC/HVC10	40CFR 52-A.21	Prevention of Significant Deterioration	73, 74,
1-GMFAC/-/PWR/PWR02	40CFR 60-A.12	General provisions - Circumvention	75 54
1-GMFAC/-/PWR/PWR02	40CFR 60-A.14	General provisions - Modification	55
1-GMFAC/-/PWR/PWR02	40CFR 60-A.4	General provisions - Address	50
1-GMFAC/-/PWR/PWR02	40CFR 60-A.7 (a)	Notification and Recordkeeping	51
1-GMFAC/-/PWR/PWR02	40CFR 60-A.7 (b)	Notification and Recordkeeping	52
1-GMFAC/-/PWR/PWR02	40CFR 60-A.9	General provisions - Availability of information	53
1-GMFAC/-/PWR/PWR02	40CFR 60-Dc.48c (a)	Reporting and Recordkeeping Requirements.	56
1-GMFAC/-/PWR/PWR02	40CFR 60-Dc.48c (g)	Reporting and Recordkeeping Requirements.	57
FACILITY	40CFR 64	COMPLIANCE ASSURANCE MONITORING	46
FACILITY	40CFR 68	Chemical accident prevention provisions	20
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	21
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	9
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	77
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	10
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	11
FACILITY	6NYCRR 201-3.2 (a)	Exempt Activities - Proof of eligibility	12
FACILITY	6NYCRR 201-3.3 (a)	Trivial Activities - proof of eligibility	13
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	22, 29, 33, 35, 47, 48
FACILITY	6NYCRR 201-6.5 (a) (4)	General conditions	14
FACILITY	6NYCRR 201-6.5 (a) (7)	General conditions	14
Fees 2			
FACILITY	6NYCRR 201-6.5 (a) (8)	General conditions	15
FACILITY	6NYCRR 201-6.5 (c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5 (c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4



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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	16
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	25
FACILITY	6NYCRR 201-6.5(f)	Operational flexibility	23, 24, 26
FACILITY	6NYCRR 201-6.5(f)(6)	Off Permit Changes	17
FACILITY	6NYCRR 201-6.5(g)	Permit shield	27
FACILITY	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	28, 29, 30, 31, 32, 33, 34, 35, 36, 37
G-MCAST/-/CL1	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	58, 59, 60
G-MCAST/-/CL2	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	61, 62, 63
G-MCAST/-/CL3	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	64, 65, 66
G-MCAST/-/CL4	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	67, 68, 69
G-MCAST/-/CL5	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	70, 71, 72
G-MCAST/-/HVC/HVC10	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	73, 74, 75
FACILITY	6NYCRR 202-1.1	Required emissions tests.	18
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	6
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	7
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	78
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	19
FACILITY	6NYCRR 212.10(b)	NOx and VOC RACT required at major facilities	31
FACILITY	6NYCRR 212.11(a)	Sampling and monitoring	44
FACILITY	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or modifications	38, 39, 79
FACILITY	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	40, 41, 42
FACILITY	6NYCRR 212.6(a)	General Process Emission Sources - opacity of emissions limited	43
FACILITY	6NYCRR 215	Open Fires	8
FACILITY	6NYCRR 221.2	Prohibition.	80
FACILITY	6NYCRR 225-1.8(a)	Reports, sampling and analysis.	45
1-GMFAC/-/PWR	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	49
FACILITY	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	32, 34
G-MCAST/-/CL1	6NYCRR 231-2	New Source Review in	58



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G-MCAST/-/CL2	6NYCRR 231-2	Nonattainment Areas and Ozone Transport Region New Source Review in Nonattainment Areas and Ozone Transport Region	61
G-MCAST/-/CL3	6NYCRR 231-2	Nonattainment Areas and Ozone Transport Region New Source Review in Nonattainment Areas and Ozone Transport Region	66
G-MCAST/-/CL4	6NYCRR 231-2	Nonattainment Areas and Ozone Transport Region New Source Review in Nonattainment Areas and Ozone Transport Region	67
G-MCAST/-/CL5	6NYCRR 231-2	Nonattainment Areas and Ozone Transport Region New Source Review in Nonattainment Areas and Ozone Transport Region	70

**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 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

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#### 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.

#### 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)

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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 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)(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.

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#### 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

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

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

40CFR 52-A.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .

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 Quality Assurance (BQA).

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.

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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.

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.

40CFR 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6NYCRR 201-6.5 (f)

This citation provides for the use a protocol for operational flexibility ("op-flex") within the permit. It will allow certain small changes in the facility's operation without having to modify the permit.

6NYCRR 201-7.2

A facility can voluntarily cap it's emissions of certain pollutants to reduce the regulatory requirements associated with it.

6NYCRR 212 .10 (b)

This requires facilities with major sources of Oxides of Nitrogen and/or Volatile Organic Compounds to submit an analysis to show the emissions are being controlled in a reasonable way.

6NYCRR 212 .11 (a)

Any facility subject to the requirements of this regulation must comply with the notification requirements

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and test their emissions of pollutants properly.

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)

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

6NYCRR 221.2

Spraying of any coatings containing asbestos in NY State is not permitted.

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 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Short Description</b>	<b>Regulation</b>
FACILITY	NOx and VOC RACT required at major facilities	6NYCRR 212.10(f)
Reason: THE CONTROL DEVICE IS A CATALYTIC OXIDIZER AND NOT AN INCINERATOR PER THE PART 200.1 DEFINITIONS. OTHER REQUIREMENTS IN THE PERMIT ENSURE COMPLIANCE WITH VOC EMISSION LIMITS AND VOC RACT.		

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Reason: THE CONTROL DEVICE IS A CATALYTIC OXIDIZER AND NOT AN INCINERATOR PER THE PART 200.1 DEFINITIONS. OTHER REQUIREMENTS IN THE PERMIT ENSURE COMPLIANCE WITH VOC EMISSION LIMITS AND VOC RACT.

Reason: THE CONTROL DEVICE IS A CATALYTIC OXIDIZER AND NOT AN INCINERATOR PER THE PART 200.1 DEFINITIONS. OTHER REQUIREMENTS IN THE PERMIT ENSURE COMPLIANCE WITH VOC EMISSION LIMITS AND VOC RACT.

Reason: THE CONTROL DEVICE IS A CATALYTIC OXIDIZER AND NOT AN INCINERATOR PER THE PART 200.1 DEFINITIONS. OTHER REQUIREMENTS IN THE PERMIT ENSURE COMPLIANCE WITH VOC EMISSION LIMITS AND VOC RACT.

Reason: THE CONTROL DEVICE IS A CATALYTIC OXIDIZER AND NOT AN INCINERATOR PER THE PART 200.1 DEFINITIONS. OTHER REQUIREMENTS IN THE PERMIT ENSURE COMPLIANCE WITH VOC EMISSION LIMITS AND VOC RACT.

Reason: THE CONTROL DEVICE IS A CATALYTIC OXIDIZER AND NOT AN INCINERATOR PER THE PART 200.1 DEFINITIONS. OTHER REQUIREMENTS IN THE PERMIT ENSURE COMPLIANCE WITH VOC EMISSION LIMITS AND VOC RACT.

Reason: THE CONTROL DEVICE IS A CATALYTIC OXIDIZER AND NOT AN INCINERATOR PER THE PART 200.1 DEFINITIONS. OTHER REQUIREMENTS IN THE PERMIT ENSURE COMPLIANCE WITH VOC EMISSION LIMITS AND VOC RACT.

Reason: A VOC RACT analysis was completed for the facility. All sources either employ at least 81% voc control, or emit less than 3 lbs per hour and/or less than 15 lbs per day, except for the two new pentane reduction chambers. Each emits only 1.8 lbs of VOC per hour, but they emit greater than 15 lbs per day. Using the ERP of 1.8 lbs/hour for 8760 hrs/year for each Pentane Reduction Chamber, the analysis showed emission controls would cost approximately \$15,000.00 per ton of VOCs reduced. This far exceeds the \$3000.00 per ton limit for economic feasibility. Therefore, no control due to economic feasibility was accepted for the pentane reduction chambers.

G-MCAST/-/CL2/CL201	Sampling and monitoring	6NYCRR 212.11(b)G-G-
MCAST/-/CL3/CL301	Sampling and monitoring	6NYCRR 212.11(b)MCAST/-G-
MCAST/-/CL4/CL401	Sampling and monitoring	6NYCRR G-MCAST/-
/CL5/CL501	Sampling and monitoring	6NYCRR
212.11(b)212.11(b)/CL1/CL101	Sampling and monitoring	6NYCRR G-
MCAST/-/HVC/HVC06	Sampling and monitoring	6NYCRR 212.11(b)212.11(b)
FACILITY	SOLVENT METAL CLEANING PROCESSES	6NYCRR 226

Reason: The facility utilizes exempt, aqueous based solvent solutions in their parts washers. Therefore, the regulation does not apply.

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 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.

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Compliance Certification

Summary of monitoring activities at GM POWERTRAIN - MASSENA PLANT:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
G-MCAST/-/HVC/HVC07	Sampling and monitoring	6NYCRR 212.11(b)
1-GMFAC/-/PWR/PWR02	record keeping/maintenance procedures	56
1-GMFAC/-/PWR/PWR02	record keeping/maintenance procedures	57
FACILITY	record keeping/maintenance procedures	46
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	25
FACILITY	record keeping/maintenance procedures	23
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	29
FACILITY	record keeping/maintenance procedures	30
FACILITY	record keeping/maintenance procedures	31
FACILITY	record keeping/maintenance procedures	32
FACILITY	record keeping/maintenance procedures	33
FACILITY	record keeping/maintenance procedures	34
FACILITY	record keeping/maintenance procedures	35
FACILITY	record keeping/maintenance procedures	36
FACILITY	record keeping/maintenance procedures	37
G-MCAST/-/CL1	record keeping/maintenance procedures	58
G-MCAST/-/CL1	record keeping/maintenance procedures	59
G-MCAST/-/CL1	record keeping/maintenance procedures	60
G-MCAST/-/CL2	record keeping/maintenance procedures	61
G-MCAST/-/CL2	record keeping/maintenance procedures	62
G-MCAST/-/CL2	record keeping/maintenance procedures	63
G-MCAST/-/CL3	record keeping/maintenance procedures	64
G-MCAST/-/CL3	record keeping/maintenance procedures	65
G-MCAST/-/CL3	record keeping/maintenance procedures	66
G-MCAST/-/CL4	record keeping/maintenance procedures	67
G-MCAST/-/CL4	record keeping/maintenance procedures	68
G-MCAST/-/CL4	record keeping/maintenance procedures	69
G-MCAST/-/CL5	record keeping/maintenance procedures	70
G-MCAST/-/CL5	record keeping/maintenance procedures	71
G-MCAST/-/CL5	record keeping/maintenance procedures	72
G-MCAST/-/HVC/HVC10	record keeping/maintenance procedures	73
G-MCAST/-/HVC/HVC10	record keeping/maintenance procedures	74
G-MCAST/-/HVC/HVC10	record keeping/maintenance procedures	75
FACILITY	record keeping/maintenance procedures	6
FACILITY	monitoring of process or control device parameters as surrogate	38
FACILITY	monitoring of process or control device parameters as surrogate	39
FACILITY	monitoring of process or control device parameters as surrogate	79
FACILITY	monitoring of process or control device parameters as surrogate	40
FACILITY	monitoring of process or control device parameters as surrogate	41
FACILITY	intermittent emission testing	42
FACILITY	intermittent emission testing	43
FACILITY	work practice involving specific operations	45
1-GMFAC/-/PWR	intermittent emission testing	49

Basis for Monitoring

**Condition #23, 24, 26:** These conditions contain protocols to be followed by the facility to allow for operational

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flexibility within the permit. As long as the protocol is followed, the changes can be made at the facility within the need to modify the permit.

**Condition #29, 33, 35:** These conditions sought to cap the respective pollutants below Title V thresholds during the initial Title V permitting of the facility. This was done under a consent order as part of bringing the facility back into compliance. Emissions are calculated monthly based on the submitted calculation methodology. The facility is able to show compliance with the annual permit limit based on a monthly rolling total.

**Condition #30, 32, 34, 36, 37:** These conditions sought to cap the respective pollutants below Title V, PSD and NSR thresholds for a large modification at the facility during the initial Title V permitting of the facility. This was done under a consent order as part of bringing the facility back into compliance.

**Condition #31:** The facility has always been able to maintain a cap on its emissions of Oxides of Nitrogen in order to cap out of NO<sub>x</sub> RACT requirements. Each month, a yearly total is calculated based on emission factors to show compliance with the annual limit. The calculation methodology is reviewed by the Department. The emissions factors are based on either, stack testing or AP-42 emission factors.

**Condition #39 & 79:** This requires the facility maintain its equipment to assure the temperature monitoring device on the catalytic oxidizers is operating properly and tying it to the production of the cast line. Should the temperature fall outside the permitted range, the cast line will automatically stop production. The temperature range was established through stack testing, assays of the catalysts, and manufacturers specifications.

**Condition #40 & 41:** The pressure monitoring device used on the baghouses controlling the listed sources shall be monitored and interlocked with the production equipment. If the bag drop falls outside the specified range, the associated emissions sources will shut down until it is measured within the proper range again. The bag drop ranges were determined using stack test information and manufacturers specifications.

**Condition #42:** The listed sources are required to operate under GM approved work practices to minimize emissions. Representative testing is required to be done at least once during the term of the permit. Standard operation of these units at maximum will not result in emission exceedances.

**Condition #43:** The facility must conduct emission testing to show compliance with this regulation. The units covered by this citation are not likely to exceed the limit while operating at maximum, therefore periodic testing is enough to show compliance.

**Condition #45:** This limits the sulfur content of any fuel oil used at the facility to 1.5% by weight as per the regulation.

**Condition #46:** The facility has some sources subject to pollutant specific requirements under the CAM (Compliance Assurance Monitoring) Rule. The CAM plan has been reviewed and found to be adequate. The CAM Plan has been integrated into the permit's monitoring conditions.

**Condition #38:** A section of catalyst from each of the control units is to be removed and sent to a lab for testing each year. The testing will measure the activity of the catalyst to ensure it remains above 65% of fresh catalyst. Stack testing will be done once during the term of the permit to show compliance.

**Condition #49:** The facility operates natural gas fired boilers subject to the opacity limit of 20% for a six minute

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average. It is not likely the boilers will emit opacity above 20%, even when operating at maximum.

**Condition #56:** The facility is required to supply different notifications if it intends to modify their boilers as each phase is beginning.

**Condition #57:** The facility must track the fuel usage in the boilers as required in the regulation.

**Condition #58 through 75:** These capping conditions were all put into place over the course of the last 5 years for projects that needed caps so as not to be subject to Prevention of Significant deterioration and /or New Source Review regulations. The same calculation methodology is used as is in the facility caps to show compliance. Each month, an annual total is calculated and compared to the emission limits.