

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 7-5032-00017/00063



09/09/2005

Facility Identification Data

Name: BORG WARNER MORSE TEC INC
Address: 800 WARREN RD
ITHACA, NY 14850

Owner/Firm

Name: BORG WARNER MORSE TEC INC
Address: 800 WARREN RD
ITHACA, NY 14850, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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ITHACA, NY 14850
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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 document is a Title V operating permit issued pursuant to 6 NYCRR 201-6 and Title V of the federal Clean Air Act. The facility is capping emissions of CO to less than 250 TPY and emissions of

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NOx to less than 100 TPY.

Attainment Status

BORG WARNER MORSE TEC INC is located in the town of LANSING in the county of TOMPKINS. 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

Borg-Warner manufactures automotive timing chains and automotive gears. Much of Borg-Warner's process involves high-temperature heating and subsequent cooling of metal pieces to impart physical characteristics to the metal. The metal pieces (links and pins) are heated in nitrogen atmospheres, cooled by queching in oil, washed with water, and reheated in tempering furnaces.

Permit Structure and Description of Operations

The Title V permit for BORG WARNER MORSE TEC INC 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

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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.

BORG WARNER MORSE TEC INC is defined by the following emission unit(s):

Emission unit 500000 - THIS EMISSION UNIT IS ASSOCIATED WITH TEMPER DRAWS WHICH ARE MANIFOLDED TOGETHER WITH EXEMPT WASH OPERATIONS PURSUANT TO 6 NYCRR PART 201-3.2(c)(39)(3). TEMPER DRAWS WOULD NORMALLY ONLY EMIT PRODUCTS OF COMBUSTION AND THEREFORE WOULD BE EXEMPT PURSUANT TO 6 NYCRR PART 201-3.2(c)(1). HOWEVER, WHEN THEY ARE MANIFOLDED WITH A WASH OPERATION THEY MAY CREATE AN EMISSION OF OIL MIST RESULTING FROM QUENCH OIL WHICH IS NOT COMPLETELY CLEANED OFF IN THE WASH PROCESS AND WHICH VOLATILIZES IN THE TEMPER OPERATION, CONDENSES IN THE STACK AND IS THEN EMITTED. THE ASSOCIATED PROCESS IS IDENTIFIED AS 500 AND IS DESCRIBED IN THE PROCESS DESCRIPTION SECTION OF THIS PERMIT.

Emission unit 500000 is associated with the following emission points (EP):

00003, 00004, 00005, 00006, 00010, 00015, 00016

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

Process: 500 is located at Building 02 - IN THIS PROCESS PARTS ARE HEAT TREATED WITH AN INTERNAL OIL QUENCHING OPERATION, WASHED AND THEN TEMPERED IN EITHER AN ELECTRIC OR GAS FIRED TEMPER DRAW.

Emission unit 510000 - THIS EMISSION UNIT IS ASSOCIATED WITH THE ROTARY BATCH PIN LINE QUENCH CONVEYOR EXHAUSTS FROM BOTH NO. 31 & NO. 32. THIS UNIT IS COMPRISED OF EMISSION POINT 51000, WHICH IS LOCATED IN THE HEAT TREAT AREA OF PLANT NO. 2. THE ASSOCIATED PROCESS IS IDENTIFIED AS 510 AND IS DESCRIBED IN THE PROCESS INFORMATION DESCRIPTION SECTION OF THIS PERMIT.

Emission unit 510000 is associated with the following emission points (EP):

51000

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

Process: 510 is located at Building 02 - IN THIS PROCESS PARTS ARE HEATED ON AN INTERMITTENT BASIS WITH CYCLES RANGING UP TO SIX HOURS, WITH ONE QUENCH PER CYCLE. THE QUENCH TANK IS MAINTAINED AT APPROXIMATELY 150 DEGREES FAHRENHEIT.

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Emission unit 520000 - THIS EMISSION UNIT IS ASSOCIATED WITH THE QUENCHING OPERATIONS ON THE AGF LINES LOCATED IN PLANT NO. 2. THE ASSOCIATED PROCESS IS IDENTIFIED AS 520 AND IS DESCRIBED IN THE PROCESS DESCRIPTION SECTION OF THIS PERMIT.

Emission unit 520000 is associated with the following emission points (EP): 00031, 00032, 00033, 00034, 00035, 00036, 00060, 00061, 52000

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

Process: 520 is located at Building 02 - IN THIS PROCESS PARTS ARE HEAT TREATED ON AN INTERMITTENT BASIS WITH CYCLES RANGING UP TO SIX HOURS WITH ONE QUENCH PER CYCLE. THE QUENCH TANKS ARE MAINTAINED AT APPROXIMATELY 150 DEGREES FAHRENHEIT.

Emission unit 530000 - THIS EMISSION UNIT IS ASSOCIATED WITH THE INDUCTION HARDENER PROCESS WHICH USES QUENCHANT SOLUTION. THIS UNIT COMPRISES ALL INDUCTION HARDENERS LOCATED IN PLANT NO. 1. THE ASSOCIATED PROCESS IS IDENTIFIED AS 530 AND IS DESCRIBED IN DETAIL IN THE PROCESS DESCRIPTION SECTION OF THIS PERMIT.

Emission unit 530000 is associated with the following emission points (EP): 5300A, 5300B, 5300C

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

Process: 530 is located at Building 01 - THIS PROCESS IS THE QUENCHING OF AN ELECTRICALLY INDUCED PART (HEATING OF A PORTION OF THE PART TO A HIGH TEMPERATURE) USING A DILUTE SOLUTION OF QUENCH MATERIAL.

Emission unit 540000 - THIS EMISSIONS UNIT CONSISTS OF A DOW PRODUCT COATING LINE. THERE ARE TWO PROCESSES ASSOCIATED WITH THIS COATING LINE, RUST PREVENTATIVE APPLICATION (540), AND DOT APPLICATION (541). THESE TWO PROCESSES ARE DESCRIBED IN THE PROCESS DESCRIPTION SECTION OF THIS PERMIT. THERE IS ONE EMISSIONS SOURCE (THE DOW COATING LINE) AND ONE EMISSION POINT.

Emission unit 540000 is associated with the following emission points (EP): 5400A

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

Process: 540 is located at Building 01 - THIS PROCESS IS THE SPRAY APPLICATION OF A RUST PREVENTATIVE ONTO A METAL PART. A ROBOTIC ARM PICKS UP THE PART, PLACES IT INTO AN ENCLOSURE WHERE THE SPRAY APPLICATION OCCURS AND THEN IMMEDIATELY REMOVES THE PART.

Process: 541 is located at Building 01 - THIS PROCESS IS THE APPLICATION OF SMALL PAINT DOTS ONTO A METAL PART. A ROBOTIC ARM ROTATES THE PART AS THE DOTS ARE APPLIED BY A FELT TIP LIKE PEN.

Emission unit 550000 - THIS UNIT CONSISTS OF METAL SINTERING FURNACES AND IS ASSOCIATED WITH PROCESS 550 WHICH IS DESCRIBED IN DETAIL IN THE PROCESS INFORMATION SECTION OF THIS PERMIT.

Emission unit 550000 is associated with the following emission points (EP): 00046, 00047, 55000, 5500A

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

Process: 550 is located at Building 01 - A POWDERED IRON ALLOY IS FORMED TO A REQUIRED SHAPE IN A HYDRAULIC PRESS. THIS "GREEN" PART IS HEATED IN THE REDUCING ATMOSPHERE OF THE SINTERING FURNACE. EMISSIONS OCCUR FROM THE ORGANIC BINDER IN THE METAL WHICH IS DRIVEN OFF WHEN HEATED, FORMING NOX AND COX.

Emission unit 570000 - THIS UNIT CONSISTS OF PROGRAMMABLE TOOL ROOM GRINDERS AND IS ASSOCIATED WITH PROCESS 570 WHICH IS DESCRIBED IN DETAIL IN THE PROCESS INFORMATION SECTION OF THIS PERMIT. THERE ARE VARIOUS OTHER MACHINING OPERATIONS ASSOCIATED WITH THIS AREA THAT ARE CLASSIFIED AS EITHER EXEMPT OR TRIVIAL PURSUANT TO 6 NYCRR PART 201-3.

Emission unit 570000 is associated with the following emission points (EP):
00011

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

Process: 570 is located at Building 02 - METAL PARTS ARE GROUND TO SPECIFICATIONS USING PROGRAMMABLE GRINDERS, THERE ARE ALSO MISCELLANEOUS MANUALLY OPERATED MACHINING TOOLS WHICH ARE CLASSIFIED AS EITHER EXEMPT OR TRIVIAL PURSUANT TO 6 NYCRR PART 201-3.

Emission unit 580000 - The N2 Process is a heat treatment operation that uses Nitrogen and Argon gas to dry metal powder and pins. The exhaust passes through a particulate filter and an oil bath. Emissions will consist of liquid particulates and solid particulates. The process also includes an exempt combustion source that exhausts through a dedicated, separate emission point.

Emission unit 580000 is associated with the following emission points (EP):
58000

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

Process: 580 is located at Building 02 - The N2 process is a heat treatment operation that uses a Nitrogen and Argon gas purge system to dry metal powder and pins. Emissions pass through a fabric filter and an oil bath.

Emission unit 590000 - This emissions unit consists of a 1200 hp engine test facility used in research and development.

Emission unit 590000 is associated with the following emission points (EP):
59000, 59100

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

Process: 590 is located at Building 02 - Process: 591 is located at Building 02 -

Title V/Major Source Status

BORG WARNER MORSE TEC INC is subject to Title V requirements. This determination is based on the following information:

The facility is a major source of CO. The primary sources of CO emissions are gasoline and diesel -fired engines used to test engine components in research and development. The facility is not major for any other pollutant.

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Program Applicability

The following chart summarizes the applicability of BORG WARNER MORSE TEC INC 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	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

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

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

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

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industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

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

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

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

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

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

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

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SIC Code	Description
3714	MOTOR VEHICLE PARTS & ACCESSORIES

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-09-002-01	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - ABRASIVE BLASTING OF METAL PARTS General
2-02-001-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
2-02-003-01	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - GASOLINE Reciprocating
3-04-022-01	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - METAL HEAT TREATING Furnace: General
3-04-022-11	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - METAL HEAT TREATING Quenching
4-02-025-99	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Other Not Classified

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract 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

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000075-07-0	ACETALDEHYDE (HAP)		> 0 but < 10 tpy
000107-02-8	ACROLEIN (HAP)		> 0 but < 10 tpy
000071-43-2	BENZENE (HAP)		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	480000	
007440-47-3	CHROMIUM (HAP)		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 2.5 tpy but < 10 tpy
007439-92-1	LEAD (HAP)		> 0 but < 10 tpy
000091-20-3	NAPHTHALENE (HAP)		> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	190000	
0NY075-00-0	PARTICULATES		>= 25 tpy but < 40 tpy
0NY075-00-5	PM-10		>= 25 tpy but < 40 tpy
007446-09-5	SULFUR DIOXIDE		>= 2.5 tpy but < 10 tpy
000108-88-3	TOLUENE (HAP)		> 0 but < 10 tpy
0NY998-00-0	VOC		>= 40 tpy but < 50 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)		> 0 but < 10 tpy

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	40CFR 52-A.21	Prevention of Significant Deterioration	39, 40
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	41
FACILITY	6NYCRR 200.5	Sealing.	1
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	2
FACILITY	6NYCRR 200.7	Maintenance of equipment.	3
FACILITY	6NYCRR 201-1.10 (b)	Permitting - public access to records kept for Title V permitting	9
FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	4
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	5
FACILITY	6NYCRR 201-1.5	Emergency defense	6
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	7
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	8
FACILITY	6NYCRR 201-3.2 (a)	Exempt Activities - Proof	10

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		of eligibility	
FACILITY	6NYCRR 201-3.3 (a)	Trivial Activities -	11
		proof of eligibility	
FACILITY	6NYCRR 201-5	State Facility Permit	59
		General Provisions	
FACILITY	6NYCRR 201-5.3 (b)	Permit Content and Terms	60
		of Issuance - permit	
		conditions	
FACILITY	6NYCRR 201-6	Title V Permits and the	12, 13,
		Associated Permit	14, 15,
		Conditions	16, 17,
			18, 19,
			20, 21,
			22, 23,
			24, 42,
			43
FACILITY	6NYCRR 201-6.1(a)	Requirement for a Title V	25, 26
		facility permit	
FACILITY	6NYCRR 201-6.5 (c) (3)	Permit conditions for	27
		Recordkeeping and	
		Reporting of Compliance	
		Monitoring	
FACILITY	6NYCRR 201-6.5 (e)	Compliance Certification	28
FACILITY	6NYCRR 201-6.5 (f)	Operational flexibility	29
FACILITY	6NYCRR 201-6.5 (g)	Permit shield	30
FACILITY	6NYCRR 202-1.1	Required emissions tests.	31
FACILITY	6NYCRR 202-2.1	Emission Statements -	32
		Applicability	
FACILITY	6NYCRR 202-2.5	Emission Statements -	33
		record keeping	
		requirements.	
FACILITY	6NYCRR 211.2	General Prohibitions -	61
		air pollution	
		prohibited.	
FACILITY	6NYCRR 211.3	General Prohibitions -	34
		visible emissions	
		limited	
5-00000/-/500	6NYCRR 212.4 (a)	General Process Emission	44
		Sources - emissions from	
		new sources and/or	
		modifications	
5-10000/-/510	6NYCRR 212.4 (a)	General Process Emission	46
		Sources - emissions from	
		new sources and/or	
		modifications	
5-20000/-/520	6NYCRR 212.4 (a)	General Process Emission	48
		Sources - emissions from	
		new sources and/or	
		modifications	
5-30000/-/530	6NYCRR 212.4 (a)	General Process Emission	50
		Sources - emissions from	
		new sources and/or	
		modifications	
5-50000/-/550	6NYCRR 212.4 (a)	General Process Emission	52
		Sources - emissions from	
		new sources and/or	
		modifications	
5-80000	6NYCRR 212.4 (a)	General Process Emission	56
		Sources - emissions from	
		new sources and/or	
		modifications	
5-70000/-/570/0057A	6NYCRR 212.4 (c)	General Process Emission	55
		Sources - emissions from	

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5-80000	6NYCRR 212.4 (c)	new processes and/or modifications General Process Emission Sources - emissions from new processes and/or modifications	57
5-00000/-/500	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	45
5-10000/-/510	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	47
5-20000/-/520	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	49
5-30000/-/530	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	51
5-50000/-/550	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	53
5-70000/-/570	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	54
5-80000/58000	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	58
FACILITY	6NYCRR 215	Open Fires	35
FACILITY	6NYCRR 226	Solvent Metal Cleaning Processes	36
FACILITY	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	37
FACILITY	6NYCRR 228.5 (h)	records	38

Applicability Discussion:

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

6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

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 201-1.2

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Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable 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 201-1.5

An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating properly at the time, the person responsible took all reasonable steps to minimize the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-1.10(b)

Any permit application, compliance plan, permit, and monitoring and compliance certification report that is submitted as part of the Title V permit process must be made available to the public as per requirements set forth under 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the Clean Air Act Amendments of 1990.

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.

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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 201-5

This regulation applies to those permit terms and conditions which are not federally enforceable. It specifies the applicability criteria for state facility permits, the information to be included in all state facility permit applications as well as the permit content, terms of permit issuance, and sets guidelines for modifying state facility permits and allowing for operational flexibility. For permitting purposes, this rule specifies the need to list all emission units except those that are exempt or trivial pursuant to Subpart 201-3 in the permit application and provide a description of the emission unit's processes and products. Finally, this rule also provides the Department the authority to include this and any other information that it deems necessary to identify applicable Federal standards, recordkeeping and reporting requirements, and establish terms and conditions that will ensure compliance with the national ambient air quality standards.

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

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)(3)

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

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deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR Part 201-6.5(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 202-1.1

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 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to

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

Facility Specific Requirements

In addition to Title V, BORG WARNER MORSE TEC INC has been determined to be subject to the following regulations:

40CFR 52-A.21

The facility is capping emissions of CO at 240 tons per year. This caps emissions at less than the PSD major source threshold.

6NYCRR 201-6.1 (a)

The facility is capping NOx emissions at 95 tons/year on a 12 month rolling basis.

6NYCRR 201-6.5 (f)

This condition implements an operational flexibility protocol for the company. It requires compliance with Part 212, all current caps, and prohibits changes that would trigger NSR/PSD.

6NYCRR 212 .4 (a)

Several devices at Borg-Warner that emit liquid particulates. Part 212.4(a) limits such emissions. The owner or operator must conduct emissions testing upon notification from DEC.

6NYCRR 212 .4 (c)

The facility operates tool room grinders that emit solid particulate matter. Such emissions are governed by Part 212.4(c). The owner is required to demonstrate compliance using stack tests, upon request from the DEC.

6NYCRR 212 .6 (a)

Several devices at Borg Warner have the potential to emit opacity. Borg Warner is required to monitor opacity from these devices on a quarterly basis and, if visible emissions are noted, to report such emissions to the DEC

6NYCRR 226

The owner is required to comply with the work practice standards for cold cleaning degreasers stated in Part 226.

6NYCRR 227-1.3 (a)

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The owner operates stationary combustion sources that meet the exemption criteria of 201-3.2, but still must comply with Part 227-1.3(a), the opacity standard.

6NYCRR 228.5 (h)

The facility operates a surface coating process (miscellaneous metal parts and products) that is exempt from Part 228 because the potential to emit VOCs is less than 10 TPY, facility wide. In order to maintain such exemption, Borg Warner is required to maintain an up-to-date calculation of its VOC PTE.

Compliance Certification

Summary of monitoring activities at BORG WARNER MORSE TEC INC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	40
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	27
FACILITY	record keeping/maintenance procedures	28
FACILITY	record keeping/maintenance procedures	29
FACILITY	record keeping/maintenance procedures	32
5-00000/-/500	record keeping/maintenance procedures	44
5-10000/-/510	intermittent emission testing	46
5-20000/-/520	intermittent emission testing	48
5-30000/-/530	intermittent emission testing	50
5-50000/-/550	intermittent emission testing	52
5-80000	intermittent emission testing	56
5-70000/-/570/0057A	record keeping/maintenance procedures	55
5-80000	intermittent emission testing	57
5-00000/-/500	monitoring of process or control device parameters as surrogate	45
5-10000/-/510	monitoring of process or control device parameters as surrogate	47
5-20000/-/520	monitoring of process or control device parameters as surrogate	49
5-30000/-/530	monitoring of process or control device parameters as surrogate	51
5-50000/-/550	monitoring of process or control device parameters as surrogate	53
5-70000/-/570	monitoring of process or control device parameters as surrogate	54
5-80000/58000	monitoring of process or control device parameters as surrogate	58
FACILITY	monitoring of process or control device parameters as surrogate	37
FACILITY	record keeping/maintenance procedures	38

Basis for Monitoring

Emissions fuel monitoring is required, as the owner must compute annual (12 month rolling) emissions of CO and NOx on a monthly basis. Opacity monitoring is required on a quarterly basis on certain devices to assess compliance with 6 NYCRR 212.6. Particulate testing is required upon notice from the DEC. An operational flexibility condition requires the owner or operator to keep records of new equipment that is added.