New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-0624-00016/02002 **03/13/2007**

Facility Identification Data
Name: VAC AIR DIVISION OF KEYWELL
Address: 300 FALCONER RD
FREWSBURG, NY 14738

Owner/Firm
Name: KEYWELL LLC
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CHICAGO, IL 60628, USA
Owner Classification: Corporation/Partnership

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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
The facility is submitting a Title V Permit application for existing sources. The facility employs a TCE vapor degreasing process which is subject to 40CFR63 Subpart T compliance requirements. The facility

is requesting a facility cap of 45 tons per year of VOCs for the purpose of capping below VOC RACT.

Attainment Status
VAC AIR DIVISION OF KEYWELL is located in the town of CARROLL in the county of CHAUTAUQUA.
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*	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 facility processes hi-tech scrap metal. The facility's primary processes include: one solvent degreasing unit, one thermal degreasing unit, three shredders, and a cleaning oven. In support of these primary functions, the facility also utilizes a number of ancillary processes and equipment that are exempt and trivial sources.

Permit Structure and Description of Operations
The Title V permit for VAC AIR DIVISION OF KEYWELL 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.

VAC AIR DIVISION OF KEYWELL is defined by the following emission unit(s):
Emission unit USHRED - Metal shredding operations for hi-temp alloys and staineless steel.
Emission unit USHRED is associated with the following emission points (EP):
EP140, EP150, EP170
It is further defined by the following process(es):
Process: P01 is located at Building main - Indoor shredding operations - #1 and #2 Shredders for Hi-Temp Alloys. Emissions vent through EP140 and EP150.
Process: P02Outdoor shredding operations for stainless steel. Emissions are fugitive.

Emission unit UTCE00 - Trichloroethylene (TCE) degreasing operations consisting of a continuous Detrex degreasing unit and activated carbon control system.
Emission unit UTCE00 is associated with the following emission points (EP):
EP620, EP630, EP640, EP650
It is further defined by the following process(es):
Process: P03Detrex in-line vapor continuous degreasing operation using TCE to remove dirt and oil. Emissions vent through EP620 and EP630. Stack TCE emissions (EP620) are controlled by C620A carbon adsorbers. The majority of fugitive TCE emissions are vented through a ceiling fan (EP630) in the Detrex room.

Emission unit UTHERM - Degreasing operations utilizing either a thermal degreaser or a cleaning oven.
Emission unit UTHERM is associated with the following emission points (EP):
EP160, EP550
It is further defined by the following process(es):
Process: P04Thermal degreasing operation exhaust flows through a series of controls. Dust emissions from the feed conveyor are controlled by a filter and are emitted indoors. Dust and VOC emissions from degreasing are controlled by a series of three devices: a cyclone, an afterburner, and a baghouse and are then emitted through EP160.
Process: P05Degreasing operation using an oven. Emissions are controlled by an afterburner, cyclone, and bag house before being emitted at EP550.

Emission unit UTORCH - Emission Unit U-TORCH includes a titanium torch (source ID P430A) and a nickel torch (source ID P440A) used for cutting scrap metal. The emission points associated with theses sources are EP430 and EP440.
Emission unit UTORCH is associated with the following emission points (EP):
EP430, EP440
It is further defined by the following process(es):
Process: P06 is located at Building main - Process P06 includes the cutting of Titanium and Nickel alloy solids using oxygen-mapp gas or oxyacetylene flame.

Title V/Major Source Status
VAC AIR DIVISION OF KEYWELL is subject to Title V requirements. This determination is based on the following information:
The air pollution sources at Keywell emit air pollutants consisting mainly of particulate matter, volatile organic compounds (VOC), and trichloroethylene (TCE). Keywell is a potentially major source of particulates, VOC and TCE emissions prior to air pollution control equipment. The facility is limiting VOC below the major source threshold of 50 tons per year (tpy). The facility actual TCE emissions are approximately 9.6 tpy. As such, the facility is not limiting the TCE emissions below 10 tpy and is classified as a major source.

Program Applicability
The following chart summarizes the applicability of VAC AIR DIVISION OF KEYWELL with regards to the principal air pollution regulatory programs:

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

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 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.

SIC Code	Description
5093	SCRAP AND WASTE MATERIALS

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
3-09-030-08	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - MACHINING OPERATIONS PLASMA TORCH
3-05-101-07	MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS CONVEYORS Scrap Metal
3-05-103-07	MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS OPEN STOCKPILES Scrap Metal
4-01-002-96	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING OTHER NOT CLASSIFIED - GENERAL DEGREASING UNITS
3-04-007-11	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - STEEL FOUNDRIES Cleaning

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		
000106-88-7	ETHYL OXIRANE(HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 10 tpy but < 25 tpy
007647-01-0	HYDROGEN CHLORIDE(HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		
0NY075-00-0	PARTICULATES		>= 25 tpy but < 40 tpy
0NY075-00-5	PM-10		
007446-09-5	SULFUR DIOXIDE		
000079-01-6	TRICHLOROETHYLENE(HAP)		>= 10 tpy
0NY998-00-0	VOC	90000	

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 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 - 6NYCRR Part 201-6.5(a)(5)**

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

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

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

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

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

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

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

abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements

(including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item L: **Permit Exclusion - ECL 19-0305**

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

Item M: **Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control

devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	55
FACILITY	40CFR 63-DDDDD.7506(c)	Industrial/Commercial/Institutional Boiler NESHAP - Boilers exempt from subpart DDDDD	31
U-TCE00	40CFR 63-T.460(a)		34
U-TCE00	40CFR 63-T.460(b)		35
U-TCE00/-/P03/P640A	40CFR 63-T.463(a)		44
U-TCE00/-/P03/P640A	40CFR 63-T.463(c)(2)(ii)		45
U-TCE00/-/P03/P640A	40CFR 63-T.463(d)		46
U-TCE00/-/P03/P640A	40CFR 63-T.463(e)(2)(iv)		47
U-TCE00/-/P03/P620A	40CFR 63-T.464	Subpart T- Alternative Standard for Batch vapor and In-line Machines	39
U-TCE00/-/P03/P640A	40CFR 63-T.465(a)	Subpart T- Test methods	48
U-TCE00/-/P03/P620A	40CFR 63-T.465(b)	Subpart T- Test methods	40
U-TCE00/-/P03/P620A	40CFR 63-T.465(c)	Subpart T- Test methods	41
U-TCE00/-/P03	40CFR 63-T.465(e)	Subpart T- Test methods	38
U-TCE00/-/P03/P640A	40CFR 63-T.466(f)	Subpart T- Monitoring procedures	49
U-TCE00/-/P03/P640A	40CFR 63-T.467(a)	Subpart T- Recordkeeping requirements	50
U-TCE00/-/P03/P640A	40CFR 63-T.467(b)	Subpart T- Recordkeeping requirements	51
U-TCE00/-/P03/P620A	40CFR 63-T.467(c)	Subpart T- Recordkeeping requirements	42
U-TCE00/-/P03/P640A	40CFR 63-T.468(b)	Subpart T- Reporting requirements	52
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U-TCE00/-/P03/P640A	40CFR 63-T.468(f)	Subpart T- Reporting requirements	54
U-TCE00/-/P03/P620A	40CFR 63-T.468(g)	Subpart T- Reporting requirements	43
U-TCE00	40CFR 63-T.468(h)	Subpart T- Reporting requirements	36
U-TCE00	40CFR 63-T.468(i)	Subpart T- Reporting requirements	37
FACILITY	40CFR 68	Chemical accident prevention provisions	21
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	22
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	56
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	12
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	13
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	14
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 32, 33
FACILITY	6NYCRR 201-6.5(a)(4)	General conditions	15
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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(d)(5)	Compliance schedules	17
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	6
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U-TCE00/-/P03/C620A	6NYCRR 212.9(b)	General Process Emission Sources - tables	58
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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

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)
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.

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 there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990.

This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, VAC AIR DIVISION OF KEYWELL has been determined to be subject to the following regulations:

40CFR 63-DDDDD.7506 (c)
This condition lists the types of boilers that are exempt from the requirements of this rule.

40CFR 63-T.460 (a)
This reference lists the type of degreaser units which are subject to the requirements in Subpart T if they use any of the six specific solvents listed with a concentration of at least 5 % by weight.

40CFR 63-T.460 (b)
This reference states that degreaser units subject to Subpart T must meet the appropriate general requirements listed in Subpart A.

40CFR 63-T.463 (a)
This reference is the heading for the existing and new in-line and batch vapor solvent cleaning machine design requirements (e.g., freeboard ratio, cover, minimize drafts) which are needed to minimize solvent loss.

40CFR 63-T.463 (c) (2) (ii)
This reference is for new in-line solvent cleaning machines which opt to demonstrate that the machine can achieve and maintain an emission limit of 0.021 pounds per hour per square foot of opening rather than installing one of the three possible control equipment options.

40CFR 63-T.463 (d)
This reference is the heading to all of the required work and operational practices that existing and new in-line and batch vapor solvent cleaning machines must meet.

40CFR 63-T.463 (e) (2) (iv)
This reference states that if a cover is used to reduce solvent loss, then the cover must be in good condition and shall cover the degreaser openings at all times except when parts are being placed in or taken out of the unit.

40CFR 63-T.464
As an alternative to using the control combinations or the idling emission limit, a machine may comply with the

NESHAP by meeting the overall emission limit, also known as the alternative standard.
Machines complying with the alternative standard are not subject to the base design requirements or work practices of 63.463.

40CFR 63-T.465 (a)
Reference Method 307 shall be used to determine the idling emission rate for batch vapor and in-line solvent cleaning machines subject to this subdivision.

40CFR 63-T.465 (b)
Solvent cleaning machines complying with the alternative standards in 63.464 must make sure that the unit contains only clean solvent, on the first operating day of each month, and the solvent level must be returned to the fill line prior to calculating the actual monthly solvent emissions.

40CFR 63-T.465 (c)
Solvent cleaning machines complying with the alternative standards in 63.464 must demonstrate that the actual solvent emissions do not exceed the allowable emissions limits by using the procedures in this subdivision. On the first operating day of each month, records of the solvent additions and deletions will be used to calculate the actual monthly and three-month rolling average solvent emissions from each unit.

40CFR 63-T.465 (e)
This subdivision provides the procedure for determining the maximum possible HAP emissions, based on solvent emissions at the current rate of operation, from the facility on a yearly basis.

40CFR 63-T.466 (f)
The owner or operator shall comply with the monitoring frequency requirements in paragraphs (a) through (e) of this section.

40CFR 63-T.467 (a)
This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for the lifetime of the machine.

40CFR 63-T.467 (b)
This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for a period of five years.

40CFR 63-T.467 (c)
This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for a period of five years.

40CFR 63-T.468 (b)
This reference provides the initial notification requirements for a new solvent cleaning machine which is subject to this subdivision. New solvent cleaning machines must submit an initial notification to the EPA as soon as possible, but before the construction or reconstruction of the unit commences.

40CFR 63-T.468 (d)
This reference provides the compliance report requirements for batch vapor and in-line solvent cleaning

machines which are subject to this subdivision (i.e., complying with the provisions in section 63.463). For existing units, this report should have been submitted to the EPA within 150 days of the compliance date. For new units, this report must be submitted to the EPA within 150 days of startup or May1, 1995, whichever is later.

40CFR 63-T.468 (f)
This reference provides the annual report requirements for batch vapor and in-line solvent cleaning machines which are subject to this subdivision (i.e., complying with the provisions in section 63.463). Each annual report must be submitted by February 1.

40CFR 63-T.468 (g)
This reference provides the solvent emissions report requirements for batch vapor and in-line solvent cleaning machines which are subject to this subdivision (i.e., complying with the alternative standards in section 63.464). The solvent emissions report must be submitted annually.

40CFR 63-T.468 (h)
This reference provides the exceedance report requirements for batch vapor and in-line solvent cleaning machines. An exceedance report must be submitted to the EPA on a semiannual basis, unless the EPA determines that more frequent reporting is needed or if an exceedance has occurred. If an exceedance occurs, the reporting frequency will be changed to quarterly.

40CFR 63-T.468 (i)
This reference provides the conditions that must be met in order to change the exceedance reporting frequency from quarterly, or more frequent as determined by the EPA, back to semiannually.

6NYCRR 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6NYCRR 212 .10
The facility is limiting VOC emissions below 45 tpy and, therefore, is not subject to VOC RACT Part 212 requirements.

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

6NYCRR 212 .6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 212 .9 (b)
This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

Non Applicability Analysis
List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Short Description	Regulation
FACILITY	Site Remediation NESHAP	40CFR 63-GGG
Reason: As per 63.7881(b)(2), the site remediation is exempt since it is performed under a State mandated Order on Consent under the authority of CERCLA as a remedial action.		
FACILITY	COMPLIANCE ASSURANCE MONITORING	40CFR 64
Reason: Solvent metal cleaning processes subject to Part 226 are not subject to the provisions of Part 212 with respect to emissions of volatile organic compounds which are not given an A rating.		
Reason: Particulate emissions generated from the cutting, torching and shredding operations are not greater than 100 tpy prior to the emission control equipment. As such, these sources are not subject to additional Compliance Assurance Monitoring.		
U-TCE00	Does not apply to: conveyor and open-top subject to 40CFR63 Sub T	6NYCRR 226.6(a)(3)
Reason: 6NYCRR Part 226 - Solvent Metal Cleaning Processes - shall not apply to conveyorized and open-top vapor degreasers subject to the requirements in 40 CFR 63, Subpart T.		
FACILITY	New Source Review in Nonattainment Areas and Ozone Transport Region	6NYCRR 231-2
Reason: Potential VOC emissions from the new solvent cleaning machine are less then 50 tpy. Thus, the proposed modification is not subject to New Source Review.		

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.

Compliance Certification
Summary of monitoring activities at VAC AIR DIVISION OF KEYWELL:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
U-TCE00	Exemptions	6NYCRR 212.7(j)
U-TCE00/-/P03/P640A	monitoring of process or control device parameters as surrogate	45
U-TCE00/-/P03/P640A	record keeping/maintenance procedures	46
U-TCE00/-/P03/P640A	record keeping/maintenance procedures	47
U-TCE00/-/P03/P620A	monitoring of process or control device parameters as surrogate	39
U-TCE00/-/P03/P640A	record keeping/maintenance procedures	48
U-TCE00/-/P03/P620A	record keeping/maintenance procedures	40
U-TCE00/-/P03/P620A	record keeping/maintenance procedures	41
U-TCE00/-/P03/P640A	record keeping/maintenance procedures	49
U-TCE00/-/P03/P640A	record keeping/maintenance procedures	50
U-TCE00/-/P03/P640A	record keeping/maintenance procedures	51
U-TCE00/-/P03/P640A	record keeping/maintenance procedures	52
U-TCE00/-/P03/P640A	record keeping/maintenance procedures	54
U-TCE00/-/P03/P620A	record keeping/maintenance procedures	43
U-TCE00	record keeping/maintenance procedures	36
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	monitoring of process or control device parameters as surrogate	26
FACILITY	record keeping/maintenance procedures	7
FACILITY	monitoring of process or control device parameters as surrogate	27
FACILITY	monitoring of process or control device parameters as surrogate	28
FACILITY	monitoring of process or control device parameters as surrogate	30
U-TCE00/-/P03/C620A	record keeping/maintenance procedures	58

Basis for Monitoring

6NYCRR Part 201-7 - Federal Enforceable Emission Caps
Keywell is a potentially major source of VOC emissions. The facility has accepted limitations on the VOC emissions to remain a minor source and avoid applicability to the control requirements of 6NYCRR Part 212.10 VOC Reasonably Available Control Technology (RACT). The facility is limiting total VOC emissions below 45 tpy. Keywell is required to maintain monthly VOC emissions estimates. In addition, the facility is required to maintain and operate the afterburners to reduce the VOC emissions.

6NYCRR Part 212 - General Process Emission Sources:
The particulate emissions generated during the production processes are regulated under 6NYCRR Part 212. These sources are applicable to an allowable particulate emission rate of 0.05 grains/dscf and are regulated by a 20 % opacity limit. Compliance with these limits is accomplished through the operation of emission control equipment and a weekly visible emission survey of the emission sources.

40 CFR 63 Subpart T - National Emission Standards for Halogenated Solvent Cleaning:
Keywell operates an exiting in-line vapor cleaning machine, identified as the Detrex Machine, using the alternative compliance standard or overall emission limit. Keywell is required to maintain emissions from the Detrex solvent cleaning machine equal to or less than 153 kilograms of TCE per sq. meter per month based on a 3-month average rolled monthly.

Keywell is proposing to install and operate a new in-line solvent vapor cleaning machine, identified as the

PCT machine. Keywell is proposing to utilize the idling emission limit as the compliance method. On-going compliance will be met using idling mode covers and routine monitoring of the primary condenser zone temperature as determined during the required idling emission test per Method 307.

40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters:
Keywell operates two exempt small gas boilers with a heat input of 6.3 mmBtu/hr. The sources are not subject to any requirements in Subpart A or DDDDD.