

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-1402-00021/00081 Renewal Number: 1



04/17/2007

Facility Identification Data

Name: LUVATA BUFFALO INC
Address: 70 SAYRE ST
BUFFALO, NY 14207-2299

Owner/Firm

Name: LUVATA BUFFALO INC
Address: 70 SAYRE ST
PO BOX 981
BUFFALO, NY 14240-0981, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: CHARLES D CRANSTON
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BUFFALO, NY 14203

Division of Air Resources:
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Air Permitting Contact:
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PO BOX 981
BUFFALO, NY 14240-0981
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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

Application for renewal of Air Title V Facility.

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Attainment Status

LUVATA BUFFALO INC is located in the town of BUFFALO in the county of ERIE. 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*	MARGINAL 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

Luvata Buffalo operates a manufacturing facility located at 70 Sayre Street, in Buffalo, New York in a mixed residential/industrial area. The facility employs approximately 625 people, and generally operates 7 days per week, 52 weeks per year. The site encompasses 79 acres including 1.1 million square feet of manufacturing area, storage and office space. The facility was established under different ownership about 1906, and became Outokumpu American Brass in 1990 and ultimately Luvata in 2006.

The facility manufactures and processes various alloys composed of copper and zinc. The major activities at the facility include: casting, annealing, hot rolling, and milling. In the cast shop, copper and other metals, including zinc alloy, are melted in electric induction furnaces and poured off into water cooled molds to form hot cakes. After heating, cakes may then be hot rolled to various thicknesses followed by being run through a milling line to create a uniform thickness. Various types of annealing furnaces are used to slowly heat and cool the alloy materials resulting in added strength and reduced brittleness. Depending on the material, strand anneals, bell anneals or cup annealing furnaces could be used. At the end of the annealing process, strand materials are generally run through an acidic bath to remove scale and metal oxides that have formed prior to being re-wound. Skimmings, grindings, dross and other materials are routinely sorted and collected for reuse in raw materials.

The facility has continued to expand production in recent years. In 1998 American Brass took over



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ownership of the four natural gas fired boilers for heat and process steam formerly owned by Encogen Four Partners, LLP. In 1999, the facility permitted a new tinning line in which brass or copper strip passes through a pot of molton tin to apply a thin coating. In late 2000 and early 2001, the facility installed a new cleaning line operation for preparation of brass strip. The facility also has several machining operations, presses, and other metalworking operations that are not vented to the atmosphere. In addition to production, the facility performs several maintenance operations, operates a water treatment facility for production wastewaters, and performs woodworking operations for pallets, etc.

The facility is subject to Title V permitting requirements due primarily to the carbon monoxide generated from the combustion of natural gas in the annealing furnaces and boilers. The facility is subject to Prevention of Significant Deterioration requirements for the same compounds. Emission calculations were prepared using a combination of published emission factors, stack test results, and engineering calculations as discussed in the application.

Permit Structure and Description of Operations

The Title V permit for LUVATA BUFFALO 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 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.

LUVATA BUFFALO INC is defined by the following emission unit(s):
Emission unit 1BOILR - The emission unit consists of four 31.5 mmbtu/hr natural gas fired boilers. Emissions are based on emission factors provided by the manufacturer.
Emission unit 1BOILR is associated with the following emission points (EP):
AUX01, AUX02, AUX03, AUX04
It is further defined by the following process(es):



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Process: NGS is located at 1, Building 0000000AUX - Natural gas is combusted in four boilers to generate steam for the Luvata facility. The boilers are subject to NSPS Subpart dc.

Process: PRP is located at 1, Building 0000000AUX - Propane is used as an emergency fuel for the four boilers. The boilers are subject to NSPS Subpart dc. Propane use is limited to a maximum of 30 days per year.

Emission unit 1CASTS - There are four casting stations in operation at the Luvata facility, designated as castings stations 2, 3, 4, and 5. Copper stock and alloying elements are melted in electric induction furnaces and poured into water cooled molds to form cakes. Fluxing agents are used for mold release. Natural gas preheat torches are used at each casting station to maintain the temperature of the runner boxes. Overhead fans are used to vent fugitive emissions. Casting stations 2 and 3 have five fans each, casting station 4 has three fans, and casting station 5 has four fans. In addition, emissions from casting stations 2 through 4 are vented to a baghouse. Emissions from casting station 5 are vented to a second baghouse.

Emission unit 1CASTS is associated with the following emission points (EP):
00030, 00033, 00034, 00040, 00055

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

Process: CAS is located at 1, Building CASTSHOP - Copper and alloying elements, including zinc alloy, are melted in electric induction furnaces and poured off into water cooled molds to form flat cakes.

Charcoal, carbon black, and other fluxing agents are used to minimize excessive fuming. Two baghouses are utilized to control emissions. Overhead roof fans are also used to alleviate fugitive emissions.

Process: HTR is located at 1, Building CASTSHOP - Natural gas is combusted in preheat torches at each of the five casting stations to maintain the temperature of the molten alloy as it is being pouted through the runner boxes. Emissions are vented through the baghouses as well as the overhead roof fans.

Emission unit 2ANEAL - There are three types of annealing equipment in use at the Luvata facility: strand anneals, bell anneals, and cup annealing furnaces. Copper alloy stock is heat treated in one of the three types of furnaces depending on the desired properties. The furnaces use natural gas to generate a carbon-rich atmosphere to heat-treat the metal.

Emission unit 2ANEAL is associated with the following emission points (EP):

00056, 00057, 00058, 00059, 00060, 00063, 00064, 00065, 00066, 00067, 00068, 00069

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

Process: ANL is located at MULTIPLE LOCATIONS - There are 12 annealing furnaces installed prior to 1970 in use at the facility to heat treat copper alloy. There are 3 types: strand anneals, bell anneals, and annealing furnaces. The 12 furnaces are located across 7 different buildings: building #24, #29, #31, #33, 2a, press room and the strip anneal bay. The furnaces use natural gas to create a carbon rich atmosphere for treating the alloy. The heat treating enhances the physical properties of the alloy making it stronger and/or more malleable. This process is similar to the annealing process used in the steel industry, however the same emission factors do not apply. Emissions from the annealing furnaces at the oab facility are based on stack testing results and natural gas usage records.

Emission unit 3STRND - The 148 strand anneal furnace uses natural gas to generate a carbon-rich atmosphere to heat-treat the metal.

Emission unit 3STRND is associated with the following emission points (EP):

00061, 00062

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

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Process: STR is located at 1, Building STANNEAL - An additional strand annealing furnace is in use at the facility to heat treat copper alloy, the 148 strand. This furnace uses natural gas to create a carbon rich atmosphere for treating the alloy. The heat treating enhances the physical properties of the alloy. This process is similar to the annealing process used in the steel industry, however the same emission factors do not apply. Emissions from the annealing furnaces at the Luvata facility are based on stack testing results and natural gas usage records. The 148 strand anneal furnace was installed after 1974 and is subject to compliance with PSD regulations.

Emission unit 5PAINT - A paint spray booth is operated at the facility. The booth is operated 6 hours per day, 90 days per year. The booth is equipped with a fan and particulate air filter.

Emission unit 5PAINT is associated with the following emission points (EP):

00051

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

Process: PNT is located at 1, Building SCRAPSTG - Painting is conducted in a paint booth approximately 6 hours per day, 90 days per year. Emissions include VOC and particulates. Particulate emissions are controlled by a particulate air filter.

Process: THN is located at 1, Building SCRAPSTG - Cleanup of painting equipment is conducted in the paint booth. VOC emissions are generated by the use of mineral spirits as a solvent for paint thinning/cleanup.

Emission unit 7CRACK - A cracking tank is used to reclaim oil from an oil/water emulsion. Emissions of hydrogen sulfide and oil mist are vented through emission point 00050.

Emission unit 7CRACK is associated with the following emission points (EP):

00050

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

Process: OIL is located at 1, Building TUBEBAY - Soluble oil and water is used as a coolant in the rolling operations at the facility. The oil and water emulsion is collected and separated in a cracking tank. The emissions from this process were calculated as part of the emission inventory and were found to be insignificant.

Emission unit 9TINLN - The emission unit consists of a flux application tank, an on-line molten tin application tank, a refining station molten tin tank and a scrubber to reduce emissions to atmosphere.

Emission unit 9TINLN is associated with the following emission points (EP):

00080, 00081, 00082

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

Process: GAS is located at 1, Building N CON. BAY - Natural gas is combusted in the flux dryer to provide heat to dry the flux before entering the tin bath, and in the on-line tin pot and refining tin pot to provide heat and maintain temperatures necessary to keep the tin molten.

Process: TIN is located at 1, Building N CON. BAY - Emissions collected by the scrubber system include HCl from the flux tank, flux dryer, and from the refining station. Zinc Oxide mist is also collected by the scrubber system, from the refining station.

Emission unit 4HOTRL - Two natural gas furnaces are used to heat cakes of copper alloy prior to rolling. Emissions from these furnaces are from the combustion of natural gas. After rolling, bars are surface milled. Chips are transported by a vacuum system, are collected by two cyclones and a scrubber (installed January 2005). The collected chips are recycled.

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Emission unit 4HOTRL is associated with the following emission points (EP):
00070, 00071, 00100

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

Process: CHT is located at 1, Building CAKESTRG - Natural gas is used to fire two furnaces, the 130 and 146 cake heaters. These furnaces are used to heat cakes of copper alloy prior to hot or cold rolling.

Process: MIL is located at 1, Building 25A - Copper alloy bars are surface milled at the torin mill, generating chips which are transported by a vacuum system. The chips are collected by a centrifugal precipitator and a rotoclone and are recycled. A second milling line, the mckay line, is used as a backup. Chips generated by this line are transported by a vacuum system and collected by a wet-type cyclone.

Emission unit 6TREAT - A steam jacket dryer is used to dry filter cake at the wastewater treatment plant. A wet scrubber is used to control emissions. Control efficiency of the scrubber is 99%.

Emission unit 6TREAT is associated with the following emission points (EP):

00048

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

Process: DRY is located at 1, Building 1 - A steam jacket dryer is used to dry filter cake at the wastewater treatment plant. A wet scrubber is used to control emissions. Control efficiency of the scrubber is 99%.

Emission unit 8SHAKE - The sorting shaker table is used to sort the casting stations' skimming and runner box debris prior to being sent out for brass/copper reclamation. Wetting the contents of the skimming boxes prior to dumping on the shaker table helps to minimize dust from this operation.

Emission unit 8SHAKE is associated with the following emission points (EP):

00052

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

Process: SHK is located at 1, Building SCRAPSTG - A sorting shaker table is used to sort the casting stations' skimming and runner box debris prior to being sent out for brass and copper reclamation. The emissions from this process were calculated in the emission inventory and were determined to be insignificant.

Title V/Major Source Status

LUVATA BUFFALO INC is subject to Title V requirements. This determination is based on the following information:

The facility is subject to Title V permitting requirements due primarily to the carbon monoxide generated from the combustion of natural gas in the annealing furnaces and boilers. The facility is subject to Prevention of Significant Deterioration requirements for the same compounds. Emission calculations were prepared using a combination of published emission factors, stack test results, and engineering calculations as discussed in the application.

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Program Applicability

The following chart summarizes the applicability of LUVATA BUFFALO 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	YES
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

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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
3351	COPPER ROLLING AND DRAWING

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
1-02-010-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - LIQUEFIED PETROLEUM GAS (LPG) Propane
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-05-150-03	MINERAL PRODUCTS MINERAL PRODUCTS - CALCINING Grinding/Milling
3-99-999-94	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified
3-99-999-95	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified
3-99-900-03	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS MANUFACTURING INDUSTRIES NATURAL GAS: PROCESS HEATERS
3-03-009-34	PRIMARY METAL PRODUCTION PRIM METAL PROD-STEEL MFG (SEE 303015 FOR INTEGRATED IRON & STEEL MACT) Heat Treating Furnaces: Annealing
3-03-900-03	PRIMARY METAL PRODUCTION PRIMARY METAL PRODUCTION - FUEL FIRED EQUIPMENT NATURAL GAS: PROCESS HEATERS
3-04-002-99	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - COPPER Other Not Classified
3-04-050-01	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - MISCELLANEOUS CASTING FABRICATING Other Not Classified
4-02-001-01	SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Paint: Solvent-Base
4-02-009-20	SURFACE COATING OPERATIONS THINNING SOLVENTS - GENERAL Mineral Spirits

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

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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
068603-15-6	ALCOHOLS, C6-12		> 0 but < 2.5 tpy
000630-08-0	CARBON MONOXIDE		>= 250 tpy
0NY100-00-0	HAP		> 0 but < 2.5 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)		> 0 but < 10 tpy
007783-06-4	HYDROGEN SULFIDE		> 0 but < 2.5 tpy
064742-32-1	LUBRICATING OILS (PETROLEUM), CHEMICALLY NEUTRALIZED SPENT		>= 2.5 tpy but < 10 tpy
008012-95-1	MINERAL OIL		>= 10 tpy but < 25 tpy
068476-80-2	OILS, VEGETABLE, DEODORIZER DISTILLATES		> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 25 tpy but < 40 tpy
0NY075-00-0	PARTICULATES		>= 10 tpy but < 25 tpy
001310-58-3	POTASSIUM HYDROXIDE		> 0 but < 2.5 tpy
068918-36-5	SOAPS, STOCK, C8-18- AND C18-UNSATD. ALKYL		> 0 but < 2.5 tpy
001310-73-2	SODIUM HYDROXIDE		> 0 but < 2.5 tpy
008052-41-3	STODDARD SOLVENT		>= 10 tpy but < 25 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
007664-93-9	SULFURIC ACID		>= 2.5 tpy but < 10 tpy
007757-83-7	SULFUROUS ACID DISODIUM SALT		>= 2.5 tpy but < 10 tpy
013463-67-7	TITANIUM DIOXIDE		>= 2.5 tpy but < 10 tpy
0NY998-00-0	VOC		>= 50 tpy but < 100 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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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

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complete.

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

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

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

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

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

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

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

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

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

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

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

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

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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

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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

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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	44
3-STRND	40CFR 52-A.21	Prevention of Significant Deterioration	37
1-BOILR	40CFR 60-A.4	General provisions - Address	32
1-BOILR	40CFR 60-Dc.48c(g)	Reporting and Recordkeeping Requirements.	33
1-BOILR/-/NGS/BOILR	40CFR 60-Dc.48c(i)	Reporting and Recordkeeping Requirements.	34
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	45
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11

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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, 28, 29
FACILITY	6NYCRR 201-6.5(a)(4)	General conditions	15
FACILITY	6NYCRR 201-6.5(a)(7)	General conditions	
Fees 2			
FACILITY	6NYCRR 201-6.5(a)(8)	General conditions	16
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c)(2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c)(3)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	24
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5(d)(5)	Compliance schedules	17
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5(f)(6)	Off Permit Changes	18
FACILITY	6NYCRR 201-6.5(g)	Permit shield	25
FACILITY	6NYCRR 201-7.1	Federally Enforceable Emissions Caps	30
3-STRND	6NYCRR 201-7.1	Federally Enforceable Emissions Caps	37
FACILITY	6NYCRR 202-1.1	Required emissions tests.	19
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	46
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	20
4-HOTRL/-/MIL	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	38
5-PAINT	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	39
6-TREAT	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	41



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9-TINLN	6NYCRR 212.4 (a)	General Process Emission Sources - emissions from new sources and/or modifications	42
1-CASTS/00030	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	35
1-CASTS/00055	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	36
5-PAINT	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	40
9-TINLN	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	43
FACILITY	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	26, 27
FACILITY	6NYCRR 215	Open Fires	9
1-BOILR	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	31

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.

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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.

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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)

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

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

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule.

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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.

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6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, LUVATA BUFFALO INC 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.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-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 60-Dc.48c (i)

This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

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6NYCRR 201-7.1

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is for the natural gas usage for the 148 strand anneal. The natural gas usage will be monitored to ensure that the CO emission limit of 100 tpy is not exceeded. Based on the 1994 stack test data, natural gas usage shall be limited to 4,147,465 ft³ per year.

6NYCRR 212 .3 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for existing (on or before July 1, 1973) process emission sources.

6NYCRR 212 .4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

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

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.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Short Description	Regulation
FACILITY	NOx and VOC RACT required at major facilities	6NYCRR 212.10
Reason: The facility has potential to emit volatile organic compounds above the major source threshold. The VOC RACT provisions of Part 212.10 do not apply because the potential emissions of all VOC sources at the facility are below 3 pounds per hour.		

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

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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 LUVATA BUFFALO INC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
1-BOILR	record keeping/maintenance procedures	33
1-BOILR/ - /NGS/BOILR	record keeping/maintenance procedures	34
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
3-STRND	monitoring of process or control device parameters as surrogate	37
FACILITY	record keeping/maintenance procedures	7
4-HOTRL/ - /MIL	record keeping/maintenance procedures	38
5-PAINT	record keeping/maintenance procedures	39
6-TREAT	record keeping/maintenance procedures	41
9-TINLN	record keeping/maintenance procedures	42
1-CASTS/00030	monitoring of process or control device parameters as surrogate	35
1-CASTS/00055	monitoring of process or control device parameters as surrogate	36
5-PAINT	intermittent emission testing	40
9-TINLN	intermittent emission testing	43
FACILITY	monitoring of process or control device parameters as surrogate	26
FACILITY	record keeping/maintenance procedures	27
1-BOILR	monitoring of process or control device parameters as surrogate	31

Basis for Monitoring

Maintenance of the vacuum system and cyclones will be performed to ensure the proper operation and collection efficiency.

The scrubber must be operated at all times of operation. The scrubber must be operated and maintained according to the manufacturers specifications.

Pressure drop through the baghouse will be measured on the outlet of the baghouse. A minimum pressure drop of 2 psi and a maximum of 6 psi will be monitored to demonstrate that the bags are intact, but not overloaded.

Opacity is limited to 20% during any six consecutive minutes.

Natural gas usage for the 148 strand anneal will be monitored to ensure that the CO emission limit of 100 tpy is not exceeded. Based on the 1994 stack test data, natural gas usage should be limited to 4,147,465 ft³ per year.