



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 9-1464-00048/00106**

**Renewal Number: 1**

**Modification Number: 1 09/24/2009**

**Facility Identification Data**

Name: TONAWANDA POWERTRAIN ENGINE PLANT

Address: 2995 RIVER RD

BUFFALO, NY 14207-1099

**Owner/Firm**

Name: GENERAL MOTORS COMPANY

Address: 300 RENAISSANCE CENTER

DETROIT, MI 48265-3000, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

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Address: TONAWANDA POWERTRAIN ENGINE PLANT

2995 RIVER RD

BUFFALO, NY 14207-1099

Phone:7168795423

**Permit Description**

**Introduction**

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

**Summary Description of Proposed Project**

This is a Department initiated modification, identified as renewal 1-modification 1. The purpose is to correct an error created when the renewal was issued that limited pounds per hour of Nitrogen Oxides from Emission Unit # U0004 . Only a ton per year limit is applicable as detailed in the condition under 201-7. Also corrected was reference to a specific number of exempt stationary combustion sources in



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condition # 9, under 6 NYCRR part 225-1, under renewal # 1. The reference to a specific number of exempt sources hinted that additional exempt sources may trigger a permit modification which is not the case. No other changes made.

**Attainment Status**

TONAWANDA POWERTRAIN ENGINE PLANT is located in the town of TONAWANDA 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.)

<b>Criteria Pollutant</b>	<b>Attainment Status</b>
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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
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\* 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:**

GM Power train is an engine machining assembly plant.

**Permit Structure and Description of Operations**

The Title V permit for TONAWANDA POWERTRAIN ENGINE PLANT

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.



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TONAWANDA POWERTRAIN ENGINE PLANT is defined by the following emission unit(s):

Emission unit U00004 - Two natural gas fired mechanical pump drive engines rated at 585 bhp each used to pump river water to cool plant machining operations. Pumps will be located in the river pump house just east of the Niagara River.

Emission unit U00004 is associated with the following emission points (EP):

E0109, E0110

Process: 109 is located at Building river pump - Emission unit includes two natural gas pumps used to pump river water to cool plant machining operations. Pumps will be located in the river pump house just east of the Niagara river.

Process: 333 is located at Building inline -

Emission unit U00003 - Mod 2 includes additional stand alone parts washers for use in the new inline engine plant. These parts washers are the same type as those used in plants 1 and 4 and will be subject to the requirements of subject to the same requirements of other degreasers under this emission unit as described in the original Title V permit issued 3/11/99. The applicable regulation is 6 NYCRR part 226, no halogenated solvents may be used. Since the parts washers are mobile the condition is specified at the facility level.

Emission unit U00003 -

Process: 333 is located at Building inline - Portable parts washers for use in the new inline engine plant. Applicable regulation is part 226, no halogenated solvents may be used.

Process: 102 is located at Building PLANT 4 -

Emission unit U00002 - Emission unit U-00002 represents all of the production machining operations and associated air washers that are subject to a 0.05 gr/dscf solid particulate emission limit. These include emission points (EP's )

M22234, M22811, M23222, M23224, M23226, M23228 thru M23233, M23235, M23236, M23405, M23475, M24566, M24905, M24906, M25865, M25868, M25869, M26101, M26160, M29171, M29172, E0094 thru E0100, E0102, E0103, E106A and E106B. A dust collector (E0111) is being added in plant 1 as part of the 3.9 L engine line, currently under construction. This list may not necessarily identify exactly all of the air washers and dust collectors as changes occur under operational flexibility. For example relocation of equipment will result in a new I.D..

Emission unit U00002 is associated with the following emission points (EP):

22234, 22811, 23222, 23224, 23225, 23226, 23228, 23229, 23230, 23231, 23232, 23233, 23235, 23236, 23405, 23475, 24566, 24905, 24906, 25865, 25868, 25869, 26101, 26160, 29171, 29172, E0094, E0095, E0096, E0097, E0098, E0099, E0100, E0102, E0103, E0111, E106A, E106B

Process: 102 is located at Building PLANT 4 - This process includes several nodular iron wet machining lines for the manufacture of engine crank shafts. Machining operations include milling, drilling, broaching, tapping, grinding, lathing, deburring, balancing, polishing, and other miscellaneous operations like sprocket press and an automatic gage. Wet machining is a multi-step machining process that shapes and finishes metal parts and uses fluids for cooling and lubrication during machining operations. The fluid used will be water and water soluble oils (synthetic, Semi-synthetic, natural oil). The particular type of oil used will depend on the part being machined and the type of machining (rough, finish). The concentration of soluble oils in the coolants will be 5% to 15 %, varying slightly upon the part being machined and the type of machining being performed. The fluid handling operations will be managed through a centralized coolant system. This system will filter and circulate the coolants to the appropriate equipment during machining operations. Both the process equipment and the ventilation from the centralized coolant system will exhaust to mist eliminators, probably made up of a helical design with a media filter or equivalent. All coolants used in the is process contain less than 0.2 lb VOC/gal as reduced for use.

Process: 106 is located at Building PLANT 4 - Dry machining for part of the crankshaft operations. No lubricating fluids, emissions vent to a baghouse and mechanical cleaner.

Process: 93A is located at Building PLANT 1 - Steel grinding- tooling services



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Process: 93B is located at Building PLANT 4 - steel grinding- cutter grind  
Process: P27 is located at Building PLANT 4 - Cast iron machining- 3.L case.  
Process: P29 is located at d10, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P30 is located at e14, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P31 is located at e15, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P33 is located at d13, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P34 is located at D10, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P35 is located at c10, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P36 is located at d8, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P37 is located at c11, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P38 is located at c12, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P40 is located at b14, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P41 is located at 4B22, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P46 is located at g15, Building PLANT 4 - Cast iron machining- 3.1L case.  
Process: P49 is located at o7, Building PLANT 1 - Cast iron machining- 3.1L case.  
Process: P64 is located at f14, Building PLANT 1 - Steel grinding- tool room  
Process: P66 is located at c23, Building PLANT 4 - Cast iron machining - 3.1 L crankshaft  
Process: P68 is located at f9, Building PLANT 1 - Cast iron machining L 18 case  
Process: P72 is located at O-28, Building PLANT 1 - L 850 crank shaft, Dry machining operation  
Process: P73 is located at BAY O-30, Building PLANT 1 - L 850 crank shaft, Dry machining  
Process: P77 is located at e7, Building PLANT 4 - Cast iron machining, 4.3 L rod.  
Process: P79 is located at a26, Building PLANT 4 - Cast iron machining- 3.1 L crankshaft.  
Process: P81 is located at 4B6, Building PLANT 4 - Cast iron machining -3.1 L rod and case.  
Process: P89 is located at Building PLANT 1 - cast iron machining - L 18 head.  
Process: P90 is located at Building PLANT 4 - Cast iron machining emission -3.1L case  
Process: P94 is located at Building PLANT 4 - This process includes several aluminum and steel wet machining lines for the manufacture of engine blocks. Machining operations include milling, drilling, boring, tapping, reaming, grinding, honing, and other miscellaneous operations like leak testing and assembly of bore liners. Wet machining is a multistep process that shapes and finishes metal parts and uses fluids for cooling and lubrication. The fluid used will be water with water soluble oils. The particular type of oil used will depend upon the part being machined and the type of machining being performed ( rough, finish). The concentration of the soluble oils in the coolant will be 5 to 15% conc. containing less than 0.2 lb VOC as reduced. Emissions will be venting to mist eliminators with a media filter or equivalent.  
Process: P98 is located at Building PLANT 4 - This process includes several aluminum and steel wet machining lines for the manufacture of engine heads. Similar to wet machining of engine blocks i.e. 5 to 15% soluble oil containing less than 0.2 lb voc/gal as mixed. Emissions vent to a mist eliminator with a media filter or equivalent.  
emis\_process\_desc

#### Title V/Major Source Status

TONAWANDA POWERTRAIN ENGINE PLANT is subject to Title V requirements. This determination is based on the following information:

Facility is considered major, per the definition in Part 201, for emissions of Carbon Monoxide, Nitrogen Oxide and Volatile Organic compounds.major\_src\_status

#### Program Applicability

The following chart summarizes the applicability of TONAWANDA POWERTRAIN ENGINE PLANT with regards to the principal air pollution regulatory programs:

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

**NOTES:**

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

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

**NESHAP** National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

**MACT** Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated 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



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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**

3714

MOTOR VEHICLE PARTS & ACCESSORIES

**SCC Codes**

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

**SCC Code**

**Description**

2-02-002-07

INTERNAL COMBUSTION ENGINES - INDUSTRIAL  
INDUSTRIAL INTERNAL COMBUSTION ENGINE -  
NATURAL GAS

3-09-030-04

RECIPROCATING: EXHAUST  
FABRICATED METAL PRODUCTS  
FABRICATED METAL PRODUCTS - MACHINING  
OPERATIONS

3-09-030-06

SPECIFY MATERIA\*\*  
FABRICATED METAL PRODUCTS  
FABRICATED METAL PRODUCTS - MACHINING  
OPERATIONS  
Honing: Specify Material in Comments

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4-02-025-02

SURFACE COATING OPERATIONS  
 SURFACE COATING OPERATIONS - MISCELLANEOUS  
 METAL PARTS  
 Cleaning/Pretreatment

**Facility Emissions Summary**

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 100 tpy but < 250 tpy
0NY100-00-0	HAP		> 0 but < 2.5 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 50 tpy but < 100 tpy
0NY075-00-5	PM-10		>= 50 tpy but < 100 tpy
007446-09-5	SULFUR DIOXIDE		>= 2.5 tpy but < 10 tpy
0NY998-00-0	VOC		>= 100 tpy but < 250 tpy

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: Sealing - 6NYCRR Part 200.5**

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



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

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

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

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

**Item C: Maintenance of Equipment - 6NYCRR Part 200.7**

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

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

**Item E: Emergency Defense - 6NYCRR Part 201-1.5**

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

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.



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(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 F: Recycling and Salvage - 6NYCRR Part 201-1.7**

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

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

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

**Item H: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)**

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

law.

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

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

law.

**Item K: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.3(a)(4)**

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.



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**Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**  
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**  
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

**Item N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**  
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Item O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)**  
The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**Item P: 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 Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**  
This permit does not convey any property rights of any sort or any exclusive privilege.

**Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)**  
The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

**Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)**  
Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be



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kept under the conditions of the permit;

iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

Such progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

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

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

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



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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

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

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



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**Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3**

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

**Item AA: Open Fires - 6 NYCRR Part 215**

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

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

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

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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**Regulatory Analysis**

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
-- FACILITY		19	Powers and Duties of the Department with respect to air pollution control
U-00004 FACILITY	40CFR 64	18	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	12	Chemical accident prevention provisions
FACILITY	40CFR 82-F	13	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3	1	False Statement.
FACILITY	6NYCRR 201-1.4	20	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-6	2, 14, 15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance Certification
U-00002 FACILITY	6NYCRR 201-6.5 (f) (1)	16	Alternate operating scenarios
FACILITY	6NYCRR 201-7	22	Federally-Enforceable Emission Caps
U-00004 FACILITY	6NYCRR 201-7	1 -2	Federally-Enforceable Emission Caps
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	21	General Prohibitions - air pollution prohibited.
U-00002 FACILITY	6NYCRR 212.4 (c)	17	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 225-1	1 -1	FUEL COMPOSITION AND USE - SULFUR LIMITATIONS



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FACILITY	6NYCRR 226	10	SOLVENT METAL CLEANING PROCESSES
FACILITY	6NYCRR 228.7	11	Table 1
U-00004	6NYCRR 231-2.2	1 -2	Applicability

**Applicability Discussion:**

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

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports 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 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.



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6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

40 CFR Part 68.

This Part lists the regulated substances and 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, TONAWANDA POWERTRAIN ENGINE PLANT has been determined to be subject to the following regulations:

40CFR 64

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

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

6NYCRR 200 .3

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.



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

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

6NYCRR 201-6.5 (f) (1)

This regulation defines, in general terms, the operational flexibility provisions associated with alternate operating scenarios. Alternate operating scenarios refer to a range of operating conditions which are defined in the permit and which allow the source the flexibility to make specified changes without requiring a permit revision. These changes cannot violate any applicable requirement and must be tracked and recorded in a log at the source.

6NYCRR 201-7

This subpart specifies how a source owner or operator may opt to avoid being subject to one or more applicable requirements to which the source or unit would have otherwise been subject, or where needed to establish an emission reduction credit by accepting federally-enforceable permit conditions restricting or capping emissions.

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 225-1

This regulation is used to set facility specific restrictions on the amount of sulfur in the fuel being burned at the facility.

6NYCRR 226

This regulation specifies the general requirements, equipment specifications and operating requirements for open-top vapor, conveyORIZED and cold cleaning degreasers.

6NYCRR 228.7

Table 1 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6NYCRR 231-2.2

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

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the requirements set forth in the other sections of the rule. In addition, certain exemptions to the rule are also defined in this section.

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**Compliance Certification**

**Summary of monitoring activities at TONAWANDA POWERTRAIN ENGINE PLANT:**

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
---		
U-00004	18	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
U-00002	16	record keeping/maintenance procedures
U-00004	1-2	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
U-00002	17	record keeping/maintenance procedures
FACILITY	1-1	work practice involving specific operations
FACILITY	10	record keeping/maintenance procedures
FACILITY	11	work practice involving specific operations
----		

**Basis for Monitoring**

Condition # 5 requires the facility to submit reports of any required monitoring at a minimum frequency of every six months. The report will define deviations from the permit and is a requirement of every Title V permit per 40 cfr part 70 .6

Condition # 6 requires the permittee to submit annual compliance certification reports. The report identifies whether compliance was continuous or intermittent and the methods used to determine compliance. this report is a required in every Title V permit per 40 cfr part 70.6.

Condition # 7 requires the permittee to submit emission summary statements for the purpose of determining fee bills.

Condition # 9 limits the amount of sulfur in fuel oil per 6 NYCRR part 225-2. Compliance is determined for vendor fuel receipts per delivery.

Condition # 10 limits the Volatile Organic Compound content of adhesives used in engine assembly operations. MSDS sheets are used to determine compliance with the 3.5 pounds VOC/gallon as applied limit.

Condition # 17- Emission Unit U0002 is comprised of numerous engine component machining lines throughout plants 1, 4 and inline all of which maintain an air washer, bagfilter, or mist eliminator for emissions that are vented to the ambient air. The contaminant of concern is particulate and



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emissions are minimal after control. This condition details the operational flexibility plan to address the needs of the facility for locating and replacing equipment without requiring a minor permit modification of this title V permit. This condition will ease the permitting burden for GM and the Department considering the significant number of sources and the frequent changes that occur.

Automated machining operations such as drilling, honing, grinding, balancing, polishing and other miscellaneous operations that are involved in engine building may be added or removed from any process identified in this permit as long as the overall emissions increase or decrease is tracked as necessary in order to determine appropriate loading and control of particulate and applicability of State and Federal regulations. Regulations of concern are 6 NYCRR part 212.4 (particulate standard of 0.05 grains/dscf) and 40 cfr 52.21, Prevention of Significant Deterioration (PSD). The de minimus increase of particulate based on "Emission Rate Potential", prior to control, is 25 tons per year (tpy) particulate matter and 15 tpy of PM -10 emissions. Emissions increases greater than the PSD de minimus must be approved by permit prior to construction. Total actual emissions increases and decreases from non-excluded physical changes or changes in the method of operation must during the five year period preceding any non-excluded physical change or change in the method of operation must be tracked and summed if the permittee wished to use emissions netting in determining PSD applicability for individual projects for which there is a significant emissions increase from the project standing alone.

The addition and or replacement of air washers is permitted as long as the criteria mentioned above is followed. This flexibility plan is consistent with Department policy.

Condition # 18 limits particulate emissions from the air washers and other control devices mentioned in condition 17. A maintenance program and records of repairs and calibrations are used to insure compliance with this requirement. This is considered sufficient because most of the emissions would be in compliance with the standard without control. Keeping the facility clean of the fine particulate and oil mist from machining is critical to engine assembly as well as employee safety.

Condition # 20 is a condition for operation of two 585 horsepower Waukesha internal combustion engines used to pump river water for plant equipment cooling. The emission rate potential (ERP) for Nitrogen Oxide (NOx) emissions from both engines is 143.17 tons per year. The NOx emissions will be controlled with catalytic reduction units and reduce potential emissions to 7.32 tons per year to avoid applicability of New Source Review. The catalytic reduction units must be operable and maintained at all times that the engines are in use except for during initial engine break in and engine rebuild break in periods of approximately 140 hours per engine per rebuild. This will ensure that the applicable limit of 40 tons of NOx per year, which is the New Source Review de minimus under 6 NYCRR 231-2, is not exceeded.

When the units are used in continuous service, and not as backup to the electric pumps, the manufacturers maintenance recommendations and/or good engineering practice must be adhered to including the following:

- 1) At a fixed load, speed, ignition timing, and exhaust oxygen sensor mV reading, monitor and record the catalyst delta temperature (T) and delta pressure (P) at installation and monthly thereafter.
- 2) If the delta T changes from fresh conditions by more than + 25 degrees F, check the engine for misfiring conditions, and/or inspect the catalyst for damage or fouling.
- 3) If the delta P changes from fresh conditions by more than 2" W.C., inspect the catalyst for damage or fouling
- 4) Inspect the catalyst annually for damage or fouling and check the emission performance at rated conditions using a portable analyzer or equivalent.

Monitoring of engines and catalyst as described above meets the requirements of Compliance



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Assurance Monitoring (CAM) under 40 cfr Part 64.

Condition 21 Details the requirements of Compliance Assurance Monitoring (CAM), 40 cfr part 64, for the Two engines mentioned above, because potential emissions of Nitrogen Oxides exceed the Title V threshold of 100 tons per year. The CAM Plan submitted with the permit renewal involves monitoring catalyst delta Temperature (T), delta Pressure (P) at installation and monthly thereafter, annual inspection of the catalyst, and annual check of stack emissions using a portable analyzer or equivalent.

A report for monitoring under this part is required annually and shall be submitted in accordance with 40 cfr part 70.6(a)(3)(iii). The report shall include, at a minimum, the information required under Sec. 70.6(a)(3)(iii) and the following information, as applicable:

- (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor down time incidents (other than down time associated with zero and span or other daily calibration checks, if applicable); and

(iii) A description of the actions taken to implement a QIP during the reporting period as specified in section 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report

documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(b) General record keeping requirements. (1) The owner or operator shall comply with the record keeping requirements specified in Sec. 70.6(a)(3)(ii) of this chapter. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to section 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).