

Facility DEC ID: 8261400320

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-2614-00320/00005
Mod 0 Effective Date: 10/05/2017 Expiration Date: 10/04/2027
Mod 1 Effective Date: 08/20/2021 Expiration Date: 10/04/2027

Permit Issued To: FIRTH RIXSON INC
181 MCKEE RD
ROCHESTER, NY 14611-2011

Contact: MICHAEL BELMONT
FIRTH RIXSON, INC
181 MCKEE RD
ROCHESTER, NY 14611
(585) 368-5037

Facility: FIRTH RIXSON INC
181 MCKEE RD
ROCHESTER, NY 14611

Contact: JEFFREY KOCIAN
Firth Rixon, Inc.
181 McKee Road
Rochester, NY 14611
(585) 295-5500

Description:
Modification 1 of the Air State Facility Permit for Firth Rixon, Inc. (dba Arcon Fastening Systems and Rings- Rochester Operations), located at 181 McKee Road, Rochester, NY, which produces seamless rolled rings for the gas turbine market. The facility includes Emission Unit U-0001 for the isothermal forging and ring production process which consists of heat treatment furnaces, forge furnaces and dust collectors along with bag houses, presses, mills, saws, grinders and heat treatment.

Modification 1 establishes a federally enforceable cap requiring the installation and operation of emissions control to limit facility particulate emissions below the Major Source Threshold. Associated monitoring conditions are included to ensure proper operation of the control devices and compliance with the cap. Modification 1 also includes minor corrections to facility emission sources.

The facility remains subject to the Area Source NESHAP for Nine Metal Fabrication and

Facility DEC ID: 8261400320

Finishing Source Categories, 40 CFR 63, Subpart XXXXXX.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: THOMAS P HALEY
 6274 E AVON LIMA RD
 AVON, NY 14414-9519

Authorized Signature: _____ Date: ___ / ___ / ___

Facility DEC ID: 8261400320

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

Facility DEC ID: 8261400320

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 5 1 Facility Inspection by the Department
- 5 2 Relationship of this Permit to Other Department Orders and Determinations
- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 6 5 Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

Facility DEC ID: 8261400320

DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Facility DEC ID: 8261400320

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: FIRTH RIXSON INC
181 MCKEE RD
ROCHESTER, NY 14611-2011

Facility: FIRTH RIXSON INC
181 MCKEE RD
ROCHESTER, NY 14611

Authorized Activity By Standard Industrial Classification Code:
3462 - IRON AND STEEL FORGINGS

Mod 0 Permit Effective Date: 10/05/2017

Permit Expiration Date: 10/04/2027

Mod 1 Permit Effective Date: 08/20/2021

Permit Expiration Date: 10/04/2027

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 6 1-1 6 NYCRR 200.7: Maintenance of Equipment
- 6 1-2 6 NYCRR 200.7: Compliance Demonstration
- 7 1-3 6 NYCRR 200.7: Compliance Demonstration
- 8 1-4 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- 8 *1-5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 11 13 6 NYCRR 211.2: Visible Emissions Limited
- 11 2 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 13 3 40CFR 63.11519(b), Subpart XXXXXX: Compliance Demonstration
- 14 4 40CFR 63.11519(c), Subpart XXXXXX: Compliance Demonstration

Emission Unit Level

EU=U-00001

- 15 5 6 NYCRR 212-2.1 (b): Compliance Demonstration
- 17 6 6 NYCRR 212-2.4 (b): Compliance Demonstration

EU=U-00001,Proc=P03

- 18 7 40CFR 63.11516(c), Subpart XXXXXX: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 21 8 ECL 19-0301: Contaminant List
- 22 9 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 22 1-6 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 23 10 6 NYCRR Subpart 201-5: Emission Unit Definition
- 24 11 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 24 1-7 6 NYCRR 201-5.3 (c): CLCPA Applicability
- 24 12 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 25 1 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 25 14 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 26 15 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=U-00001

- 29 16 6 NYCRR 212-2.1 (a): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

FEDERALLY ENFORCEABLE CONDITIONS

Mod 1/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 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.

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 - 6 NYCRR 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 - 6 NYCRR 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,

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

required to operate such device effectively.

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

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

Item E: Recycling and Salvage - 6 NYCRR 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 F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 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 G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 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 H: Proof of Eligibility for Sources Defined as Trivial

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Activities - 6 NYCRR 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 I: Required Emission Tests - 6 NYCRR 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 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: 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 L: Federally Enforceable Requirements - 40 CFR 70.6 (b)

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1-1: Maintenance of Equipment
Effective between the dates of 08/20/2021 and 10/04/2027

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-1.1:

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.

Condition 1-2: Compliance Demonstration
Effective between the dates of 08/20/2021 and 10/04/2027

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-2.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: U-00001	
Process: P03	Emission Source: C0002
Emission Unit: U-00001	
Process: P09	Emission Source: C0004
Regulated Contaminant(s):	
CAS No: 0NY075-00-0	PARTICULATES

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In accordance with the facility emissions cap limiting particulate emissions, the facility must install and operate a control device with a minimum control efficiency of 99.5% for Emission Sources S0012 and Emission Source S0052.

To demonstrate compliance with this requirement, the facility owner or operator must maintain the pressure drop across the filter at or between 1.0 and 6.0 inches of water. This limit applies at all times while the process is operating except during initial filter conditioning following installation of a new filter. The facility owner and operator must monitor the pressure drop across the filter on a daily basis.

The facility must document and investigate any instances where the pressure drop falls outside of this range. Documentation must include the cause (e.g., new filter conditioning, pulse cleaning, etc.) and any corrective actions. Records of daily pressure readings and filter changes must be maintained for a period of at least five years and made available to the Department upon request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1.0 inches of water

Upper Permit Limit: 6.0 inches of water

Monitoring Frequency: DAILY

Averaging Method: AVERAGING METHOD - SEE MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-3: Compliance Demonstration

Effective between the dates of 08/20/2021 and 10/04/2027

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-3.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00001

Process: P03

Emission Source: C0006

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In accordance with the facility emissions cap limiting particulate emissions, the facility must install and operate a control device with a minimum control efficiency of 99.5% for Emission Source S0013.

To demonstrate compliance with this requirement, the facility owner or operator must maintain the pressure drop across the filter at or between 1.5 and 8.0 inches of water. This limit applies at all times while the process is operating except during initial filter conditioning following installation of a new filter. The facility owner and operator must monitor the pressure drop across the filter on a daily basis.

The facility must document and investigate any instances where the pressure drop falls outside of this range. Documentation must include the cause (e.g., new filter conditioning, pulse cleaning, etc.) and any corrective actions. Records of daily pressure readings and filter changes must be maintained for a period of at least five years and made available to the Department upon request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1.5 inches of water

Upper Permit Limit: 8.0 inches of water

Monitoring Frequency: DAILY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-4: Facility Permissible Emissions
Effective between the dates of 08/20/2021 and 10/04/2027

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-4.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY075-00-0 (From Mod 1) PTE: 190,000 pounds
 per year
 Name: PARTICULATES

Condition 1-5: Capping Monitoring Condition
Effective between the dates of 08/20/2021 and 10/04/2027

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Item 1-5.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

Item 1-5.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-5.3:

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.

Item 1-5.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-5.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-5.6:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: U-00001	
Process: P03	Emission Source: S0012
Emission Unit: U-00001	
Process: P03	Emission Source: S0013
Emission Unit: U-00001	
Process: P09	Emission Source: S0052
Regulated Contaminant(s):	
CAS No: 0NY075-00-0	PARTICULATES

Item 1-5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

To limit facility potential-to-emit (PTE) particulate emissions below 95 tons per year, the facility owner or operator must install and operate a particulate control device on Emission Sources S0012, S0013, and S0052. The control devices must achieve a minimum control efficiency of 99.5 percent.

To demonstrate compliance with this requirement, the facility owner and operator must maintain documentation from the manufacture that guarantees the 99.5 percent control requirement is met. The facility owner and operator must verify that the devices are operating within manufacturer specifications by meeting with the periodic monitoring requirements specified in monitoring conditions elsewhere in this permit.

The facility owner or operator must verify the control efficiency via an EPA Method 5 stack test upon request by the Department. The Department reserves the right to require a stack test at any time. In accordance with 6 NYCRR 202-1, a stack test protocol must be submitted to the Department at least 30 days prior to conducting the stack test. A stack test report must be submitted to the Department in triplicate within 60 days of completing the test.

The facility owner or operator must submit capping certifications to the Department annually. Annual Capping Certifications must report actual facility particulate emissions for each calendar month and on a 12-month rolling basis.

Records of control device manufacturer guarantees, supporting information, completed testing, and submitted reports must be maintained by the facility for a minimum of five years and made available to the Department upon request.

Parameter Monitored: DEGREE OF AIR CLEANING

Lower Permit Limit: 99.5 percent reduction

Reference Test Method: EPA Method 5

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 12 calendar month(s).

Condition 13: Visible Emissions Limited

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Effective between the dates of 10/05/2017 and 10/04/2027

Applicable Federal Requirement:6 NYCRR 211.2

Item 13.1:

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.

Condition 2: Compliance Demonstration
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 2.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: U-00001
Process: P01

Emission Unit: U-00001
Process: P02

Emission Unit: U-00001
Process: P03

Emission Unit: U-00001
Process: P04

Emission Unit: U-00001
Process: P05

Emission Unit: U-00001
Process: P06

Emission Unit: U-00001
Process: P07

Emission Unit: U-00001
Process: P08

Emission Unit: U-00001
Process: P09

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Monitoring Type: MONITORING OF PROCESS OR CONTROL
 DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies monthly while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department. A summary of these records will be included in the annual compliance monitoring report.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: METHOD 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
 DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Condition 3: Compliance Demonstration
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable Federal Requirement: 40CFR 63.11519(b), Subpart XXXXXX

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must prepare and submit annual certification and compliance reports for each affected source according to the requirements below:

(1) Annual certification and compliance reports shall be prepared and submitted as follows:

- The information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

- The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.

- Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.

- Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.

(2) The annual certification and compliance report must contain the following information:

- Company name and address;

- Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

- Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 4: Compliance Demonstration
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable Federal Requirement:40CFR 63.11519(c), Subpart XXXXXX

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must collect and keep records of the data and information specified below for each affected source:

- Each notification and report that was submitted to comply with this subpart, and the documentation supporting each notification and report.

- Records of the applicability determinations as in §63.11514(b)(1) through (5), “Am I subject to this subpart,” listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.

- A record of the manufacturer's specifications for the control devices used to comply with §63.11516, “What are my standards and management practices?”.

- Manufacturer's instructions. If you comply with this subpart by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review.

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Records shall be maintained according to the requirements below:

- Records shall be in a form suitable and readily available for expeditious review, according to §63.10(b)(1), “General Provisions.” Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- As specified in §63.10(b)(1), “General Provisions,” you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
- You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1), “General Provisions.” You may keep the records off-site for the remaining 3 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

****** Emission Unit Level ******

Condition 5: Compliance Demonstration
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

rating assigned to the contaminant by the department.

The listed non-HTAC contaminants have been demonstrated to be in compliance with 6 NYCRR Part 212-2.1(b) by meeting either:

- 1- the degree of air cleaning required for the rating given to each contaminant, or
- 2- the NAAQS, or
- 3- the DAR-1 guideline concentrations.

The facility owner or operator shall verify the parameters used to demonstrate compliance with Table 3 or Table 4 annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer’s or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating of any contaminant may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers’ recommendations for minimizing emissions.

Records of observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the annual compliance monitoring report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 6: Compliance Demonstration
Effective between the dates of 10/05/2017 and 10/04/2027**Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)****Item 6.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications annually. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate. These annual compliance verifications do not include a Method 5 emissions evaluation.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that the permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department. A summary of these records will be included in the annual compliance monitoring report.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per cubic foot

Reference Test Method: METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 7: Compliance Demonstration
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable Federal Requirement: 40CFR 63.11516(c), Subpart XXXXXX

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Process: P03

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility performs dry grinding or dry polishing with machines, the facility must comply with the following requirements if the dry grinding and polishing operations use materials that contain metal fabrication HAP (MFHAP):

1) The facility must capture emissions and vent them to a filtration control device. The facility must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified in §63.11519(c)(4).

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

- 2) The facility must implement management practices to minimize emissions of MFHAP by:
- taking measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
 - operating all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to the manufacturer's instructions.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

(2) the equipment at the facility was being properly operated and maintained;

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

(4) the facility owner 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 any corrective actions taken.

(b) In any enforcement proceeding, the facility owner 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 malfunction provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

with 6 NYCRR Part 616 - Public Access to Records.
Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: **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.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 8: Contaminant List
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable State Requirement:ECL 19-0301

Item 8.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 007439-96-5
Name: MANGANESE

CAS No: 007440-02-0
Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 007440-47-3
Name: CHROMIUM

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

CAS No: 007440-62-2

Name: VANADIUM

CAS No: 0NY075-00-0

Name: PARTICULATES

Condition 9: Malfunctions and start-up/shutdown activities
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable State Requirement: 6 NYCRR 201-1.4

Item 9.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 1-6: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 08/20/2021 and 10/04/2027

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Applicable State Requirement:6 NYCRR 201-1.4**Item 1-6.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 10: Emission Unit Definition**Effective between the dates of 10/05/2017 and 10/04/2027****Applicable State Requirement:6 NYCRR Subpart 201-5****Item 10.1(From Mod 1):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00001

Emission Unit Description:

This emission unit consists of miscellaneous emission sources related to the facility's isothermal forging and

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

ring production process. The sources include furnaces, presses, mills, saws, grinders and heat treatment.

Building(s): MAIN

Condition 11: Renewal deadlines for state facility permits
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 11.1:

The owner or operator of a facility having an issued state facility 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.

Condition 1-7: CLCPA Applicability
Effective between the dates of 08/20/2021 and 10/04/2027

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 1-7.1:

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

Condition 12: Compliance Demonstration
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
 NYS Dept. of Environmental Conservation
 Region 8
 6274 East Avon-Lima Rd.
 Avon, NY 14414

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2018.
 Subsequent reports are due every 12 calendar month(s).

Condition 1: Air pollution prohibited
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable State Requirement:6 NYCRR 211.1

Item 1.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

****** Emission Unit Level ******

Condition 14: Emission Point Definition By Emission Unit
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 14.1(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00001

Emission Point: EP003
 Height (ft.): 13 Length (in.): 24 Width (in.): 12
 NYTMN (km.): 4781.349 NYTME (km.): 282.972

Emission Point: EP005
 Height (ft.): 4 Length (in.): 60 Width (in.): 60
 NYTMN (km.): 4781.349 NYTME (km.): 282.972

Emission Point: EP006
 Height (ft.): 10 Diameter (in.): 12
 NYTMN (km.): 4781.349 NYTME (km.): 282.972

Emission Point: RV001
 Height (ft.): 50 Length (in.): 3034 Width (in.): 4
 NYTMN (km.): 4781.349 NYTME (km.): 282.972

Emission Point: RV002
 Height (ft.): 50 Length (in.): 1460 Width (in.): 4

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

NYTMN (km.): 4781.349 NYTME (km.): 282.972

Emission Point: RV003
Height (ft.): 50 Length (in.): 970 Width (in.): 4
NYTMN (km.): 4781.349 NYTME (km.): 282.972

Emission Point: RV004
Height (ft.): 50 Length (in.): 2125 Width (in.): 12
NYTMN (km.): 4781.349 NYTME (km.): 282.972

Condition 15: Process Definition By Emission Unit
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 15.1(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: P02 Source Classification Code: 3-04-022-01
Process Description:
Heat Treatment (Oil and Water Quench Tanks, furnaces)

Emission Source/Control: QNCH7 - Process

Emission Source/Control: S0007 - Process

Emission Source/Control: S0008 - Process

Emission Source/Control: S0009 - Process

Emission Source/Control: S0010 - Process

Emission Source/Control: S0011 - Process

Emission Source/Control: S0082 - Process

Emission Source/Control: S0083 - Process

Emission Source/Control: S0085 - Process

Item 15.2(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: P03 Source Classification Code: 3-09-999-97
Process Description: Grinding

Emission Source/Control: C0002 - Control
Control Type: FABRIC FILTER

Emission Source/Control: C0006 - Control

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Control Type: FABRIC FILTER

Emission Source/Control: S0012 - Process

Emission Source/Control: S0013 - Process

Item 15.3(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001

Process: P09

Source Classification Code: 3-09-999-97

Process Description: Miscellaneous Sources

Emission Source/Control: C0003 - Control

Control Type: FABRIC FILTER

Emission Source/Control: C0004 - Control

Control Type: FABRIC FILTER

Emission Source/Control: S0051 - Process

Emission Source/Control: S0052 - Process

Item 15.4(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001

Process: P01

Process Description:

Saws Department (Abrasive and Band Saws) - Billet
Sectioning utilizing cooling fluids. Control C0001 only
controls emissions from source S0001.

Emission Source/Control: C0001 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: S0001 - Process

Emission Source/Control: S0002 - Process

Emission Source/Control: S0003 - Process

Emission Source/Control: S0004 - Process

Emission Source/Control: S0005 - Process

Emission Source/Control: S0006 - Process

Item 15.5(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Process: P04

Process Description:

350 Cell: 350T Press, 800T Press, 630
Mill, 350 Mill, and 1500T Bliss Press

Emission Source/Control: S0023 - Process

Emission Source/Control: S0024 - Process

Emission Source/Control: S0025 - Process

Emission Source/Control: S0026 - Process

Item 15.6(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001

Process: P05

Process Description:

125/1200T Cell: 125 Mill, 500T Press,
Large Ring Expander, 2000T Press

Emission Source/Control: S0032 - Process

Emission Source/Control: S0033 - Process

Emission Source/Control: S0034 - Process

Emission Source/Control: S0035 - Process

Emission Source/Control: S0036 - Process

Emission Source/Control: S0037 - Process

Item 15.7(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001

Process: P06

Process Description:

VRM Cell: Vertical Ring Mill, CDL manipulator (tack
mounted), 1500T United Press, Small Ring expander

Emission Source/Control: S0039 - Process

Emission Source/Control: S0040 - Process

Emission Source/Control: S0041 - Process

Emission Source/Control: S0042 - Process

Item 15.8(From Mod 0):

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: P07
Process Description:
3000T Cell: 3000T Press, 750T Shear Press, Glamma
manipulator

Emission Source/Control: S0046 - Process

Emission Source/Control: S0047 - Process

Item 15.9(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: P08
Process Description:
80/63 Mill: 8063 Ring Mill, 8063 Mill Andromat
Manipulator

Emission Source/Control: S0049 - Process

Emission Source/Control: S0050 - Process

Emission Source/Control: S0084 - Process

Condition 16: Compliance Demonstration
Effective between the dates of 10/05/2017 and 10/04/2027

Applicable State Requirement:6 NYCRR 212-2.1 (a)

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):
CAS No: 007439-96-5 MANGANESE
CAS No: 007440-47-3 CHROMIUM
CAS No: 007440-62-2 VANADIUM
CAS No: 007440-02-0 NICKEL METAL AND INSOLUBLE

COMPOUNDS

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility owner or operator shall not allow emissions
of an air contaminant to violate the requirements

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

specified in Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

Nickel, Chromium, Manganese and Vanadium have been given an Environmental Rating of A for the process emission sources identified. Emissions of these HTACs have been demonstrated to be in compliance with 6 NYCRR Part 212-2.1(a) by meeting either:

- 1- the degree of air cleaning required for the rating given to each contaminant, or
- 2- the DAR-1 guideline concentrations.

The facility owner or operator shall maintain and operate all associated control equipment to ensure that the degree of air cleaning is at least 99.5% at all times to maintain compliance with 6 NYCRR Part 212-2.2(b).

The facility owner or operator shall verify the parameters used to demonstrate compliance with 6 NYCRR Part 212 annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320

Records of observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the annual compliance monitoring reports.

Parameter Monitored: PARTICULATES

Lower Permit Limit: 99.5 percent degree of air cleaning
or greater

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Permit ID: 8-2614-00320/00005

Facility DEC ID: 8261400320