



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

**Permit ID: 4-2732-00014/00057**

**Renewal Number: 3**

**Modification Number: 1 12/28/2016**

**Facility Identification Data**

Name: KEYMARK CORP PLANT

Address: 1188 CAYADUTTA ST

FONDA, NY 12068

**Owner/Firm**

Name: KEYMARK CORPORATION

Address: 1188 CAYADUTTA ST

FONDA, NY 12068, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

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CAYADUTTA ST

FONDA, NY 12068

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**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

This project consists of a minor modification to replace the existing Paint Line 1 showers (Emission units U-00016 and U-00017) with a new shower line. The new shower line will be housed in a new building that will be constructed on the east side of the facility adjacent to the thermal oxidizers. The old shower line will be removed.



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**Attainment Status**

KEYMARK CORP PLANT is located in the town of MOHAWK in the county of MONTGOMERY. 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>
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

\*\* NOx has a separate ambient air quality standard in addition to being an ozone precursor.

**Facility Description:**

Keymark is an aluminum extrusion facility located in Fonda, New York. The basic flow of operations at the facility is as follows. Scrap aluminum, sows, ingots, etc. are charged to a melter which is heated by a natural gas burner. A typical charge is 55,000 pounds. At specified times, the molten aluminum is transferred to a holder which is subsequently tapped in order to cast logs. The cast logs are transferred to a homogenizing furnace in order to obtain the proper alloy structure. The cast logs, which may be supplemented with purchased logs, are then transferred to one of four extrusion presses. In the presses, the logs are preheated and then rammed through preheated dies in order to form the selected extruded shapes. The dies are manufactured in house in the tool and die shop (KTD). Once the extrusion run has been completed, the dies are taken to the die shop where they are immersed in heated alkaline solutions in order to melt out any residual aluminum. The extruded aluminum shapes are cut to specified lengths and placed into aging ovens which serve to harden the parts. Following the aging ovens, the extruded shapes undergo one of the following steps: surface coating, anodizing, or direct shipment to customers.

Surface coating is performed in one of two conveyerized paint spray lines. Both lines include the following sequence of steps; pretreatment with alkaline and acid showers, drying in an oven, coating, flash off, and curing in an oven. Both lines use thermal oxidizers for volatile organic compound (VOC) control. Processes associated with the paint spray operations include mix rooms, a pyrolyzing furnace in which dried paint is burned off the hooks used to hang the aluminum parts from the conveyor, and equipment clean up using solvent.

Anodizing is performed in a series of solution tanks in a separate portion of the facility. Extruded parts are placed into racks which are then transferred from tank to tank in order to impart a protective coating. Several of the tanks have exhaust systems that vent emissions through roof top mounted scrubbers.

Other activities at the facility include maintenance shops, a fill and debridge area in which resin is injected into the extruded part which is then machined so that a thermal break is formed, waste water treatment facilities, non contact cooling water towers, packaging, and shipping. All fuel fired equipment (heaters, ovens, solution tanks, etc.) use natural gas.



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**Permit Structure and Description of Operations**

The Title V permit for KEYMARK CORP 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.

KEYMARK CORP PLANT is defined by the following emission unit(s):

Emission unit U00006 - Cast house holder for molten aluminum received from cast house melter. Holder maintains molten aluminum at temperature prior to tapping and pouring into molds. Furnace is heated with natural gas burner. Emissions from molten aluminum and combustion are ducted through a single stack. Small quantities of magnesium and silicon may be added to the holder per alloy specifications. The operation is in the main plant.

Emission unit U00006 is associated with the following emission points (EP):  
00006

Process: 005 is located at 1, Building 1 - This process involves the holding, tapping, and pouring of molten aluminum received from the cast house melter. A typical charge to the holder is 55,000 pounds of aluminum. Magnesium ingots and silicon disks are typically added, but the quantity is less than 0.5 percent of the charge. Other alloying elements, such as copper, may also be added.

Process: E03 is located at 1, Building 1 - Natural gas fired burner for the holder. The combustion emissions are exhausted through the stack of the holder. The maximum rated capacity of the burner is 27 mmBtu/hr.

Emission unit U10001 - Anodize line solution tank 2. A 15,000 gallon heated solution tank.

Emission unit U10001 is associated with the following emission points (EP):  
10001

Process: 025 is located at 1, Building 2 - A 15,000 gallon solution tank is used in the aluminum anodize process. Racked parts are immersed in the tank in order to prepare the parts for subsequent processing.



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The tank is heated with a natural gas fired burner. Combustion emissions are exhausted separately. The reactions that occur in the tank in conjunction with the heating of the solution result in the emission of liquid particulate.

Emission unit U00005 - Cast house melter for aluminum scrap, ingots, sows, etc. Furnace is heated with natural gas burner. Emissions from melting and combustion are ducted through three stacks. A slipstream of air from the melter is ducted to a sow preheater for preheating the sows prior to putting them into the melter. The sow preheater has a separate stack. There is also a fume hood with a separate stack. The fume hood is located over the entrance to the melter. The operation is in the cast house area of the main plant.

Emission unit U00005 is associated with the following emission points (EP):  
00005, 00007, 00008

Process: 004 is located at 1, Building 1 - This process involves the charging of the cast house melter with aluminum. A typical charge to the melter is 55,000 pounds of aluminum. Flux is typically added to each charge but the quantity of flux added is less than 0.5 percent of the total charge. Alloying elements, such as copper and manganese, may also be added.

Process: E02 is located at 1, Building 1 - Natural gas fired burner for the melter. The combustion emissions are exhausted through the stack of the melter, fume hood, and sow preheater. The maximum rated capacity of the burner is 20 mmBtu/hr.

Emission unit U30001 - Alkaline pretreatment shower for extruded aluminum parts prior to painting in Paint Line 2. Parts are sprayed with an alkaline solution as they pass through on a conveyor.

Emission unit U30001 is associated with the following emission points (EP):  
30001

Process: 301 is located at 1, Building 1 - Extruded aluminum parts are sprayed with an alkaline pretreatment shower prior to painting, resulting in the emission of liquid particulate through the stack.

Emission unit U00029 - Fill and debridge. Channels in extruded aluminum parts are filled with resin. A strip of aluminum is then removed in order to form a thermal barrier.

Emission unit U00029 is associated with the following emission points (EP):  
00029

Process: 01E is located at 1, Building 2 - In order to form a thermal break in certain products (e.g. window frames) a two part resin is injected into a channel in the extruded part. A strip of aluminum is then machined away leaving a gap between the two parts of the aluminum extrusion. The two parts of the resin react with negligible emissions. The resin lines are flushed out using a solvent. There are minimal solvent emissions.

Emission unit U00034 - Paint Line 2. A conveyerized paint spray operation in which extruded aluminum parts are hung from hooks and then subjected to the following operations; pretreatment acid and alkaline showers (addressed separately as Emission Units U-30001 and U-30002), drying oven, coating application in two spray booths using electrostatic disks, curing oven, and flash off. Paint is mixed and distributed from



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a separate room. Solvent is used to clean up the spraying equipment. Filters are used in both booths for particulate control. The exhausts of the two booths, oven, and flash off tunnel are vented through a thermal oxidizer which also has filters.

Emission unit U00034 is associated with the following emission points (EP):

20005, 20006, 20007, 20008, 20009, 20011, 20012

Process: 201 is located at 1, Building 1 - Paint Line 2 paint spray booth 1. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a hydraulic ram. Panel filters are used for particulate control. The exhaust is ducted through a thermal oxidizer which also has particulate control filters.

Process: 202 is located at 1, Building 1 - Paint Line 2 paint spray booth 2. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a hydraulic ram. Panel filters are used for particulate control. The exhaust is ducted through a thermal oxidizer which also has particulate control filters.

Process: 203 is located at 1, Building 1 - Paint Line 2 curing oven. Painted parts are conveyed through a curing oven. The oven is heated using a burner fired by natural gas. Combustion emissions from the burner are vented separately. The oven exhaust is ducted through a thermal oxidizer.

Process: 205 is located at 1, Building 1 - Paint Line 2 dry oven. Following the pretreatment showers, the parts are conveyed through a drying oven prior to painting. The oven is heated with a burner that is fired with natural gas. Combustion emissions from the burner are vented separately.

Process: 206 is located at 1, Building 1 - Paint Line 2 dry oven hood. A hood over the inlet/outlet to the drying oven. The purpose of the hood is to vent heated air from the oven. Emissions vented through this natural draft stack should be minimal.

Process: 207 is located at 1, Building 1 - Paint Line 2 roof vent. One of three roof vents over Paint Line 2 that is primarily designed to remove heat from the area over the curing oven. Emissions vented through the roof vent should be minimal.

Process: 208 is located at 1, Building 1 - Paint Line 2 roof vent. One of three roof vents over Paint Line 2 that is primarily designed to remove heat from the area over the curing oven. Emissions vented through the roof vent should be minimal.

Process: 209 is located at 1, Building 1 - Paint Line 2 roof vent. One of three roof vents over Paint Line 2 that is primarily designed to remove heat from the area over the curing oven. Emissions vented through the roof vent should be minimal.

Process: 210 is located at 1, Building 1 - Paint Line 2 flash off vent. Following the coating of parts in the paint spray booths, the parts are conveyed through a flash off area prior to entering the curing oven. A vent over the area exhausts any emissions that occur during flash off. The vent is ducted through a thermal oxidizer.

Process: 212 is located at 1, Building 1 - Thermal oxidizer natural gas burner. A natural gas fired burner for the oxidizer with a maximum rated capacity of 2.55 mmBtu/hr.

Emission unit U00016 - Alkaline pretreatment shower for extruded aluminum parts prior to painting in Paint Line 1. Parts are sprayed with an alkaline solution as they pass through on a conveyor.



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Emission unit U00016 is associated with the following emission points (EP):  
00016

Process: 012 is located at 1, Building 5 - Extruded aluminum parts are sprayed with an alkaline pretreatment shower prior to painting resulting in the emission of liquid particulate through the steam vent that is located at the inlet to the shower system. The alkaline solution is drawn from a 4,000 gallon tank maintained at 150 F. The spray nozzle flow is 2.8 gallons per minute.

Emission unit U00028 - Hook oven. Dried paint on conveyor hooks is removed in a controlled pyrolysis cleaning furnace. The furnace is heated with a natural gas fired burner. The combustion emissions are exhausted with the process emissions.

Emission unit U00028 is associated with the following emission points (EP):  
00028

Process: 01D is located at 1, Building 1 - The extruded aluminum parts that are painted in the two paint spray lines are suspended from the conveyors on hooks. To remove the dried paint from the hooks, they are placed in batches in a controlled pyrolysis heating furnace. The furnace is heated with a natural gas fired burner. The majority of the paint is converted to ash and removed as waste. Particulate emissions are minimal.

Process: F05 is located at 1, Building 1 - Natural gas fired burner for the pyrolysis furnace. The combustion emissions are exhausted through the stack of the furnace. The maximum rated capacity of the burner is 0.29 mmBtu/hr.

Emission unit U00035 - Paint Line 1. A conveyORIZED paint spray operation in which extruded aluminum parts are hung from hooks and then subjected to the following operations: pretreatment acid and alkaline showers (addressed separately as Emission Units U-00016 and U-00017), drying oven, coating application in four spray booths using electrostatic disks, bake oven, and flash off. Paint is mixed and distributed from a separate room. Solvent is used to clean up the spraying equipment. Filters are used in all booths for particulate control. The exhausts of the booths, bake oven, smoke hood, and flash off area are vented through two thermal oxidizers which also have filters.

Emission unit U00035 is associated with the following emission points (EP):  
00018, 00019, 00020, 00021, 00022, 00023, 00030, 00045

Process: 006 is located at 1, Building 1 - Paint Line 1 bake oven. Painted parts are conveyed through a bake oven. The oven is heated using a natural gas fired burner. combustion emissions from the burner are vented separately. The oven exhaust is vented through thermal oxidizers.

Process: 008 is located at 1, Building 1 - Paint Line 1 paint spray booth 1. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 009 is located at 1, Building 1 - Paint Line 1 spray booth 2. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.



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Process: 00A is located at 1, Building 1 - Paint Line 1 spray booth 3. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 00B is located at 1, Building 1 - Paint Line 1 spray booth 4. Paint applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 014 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.

Process: 015 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.

Process: 016 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.

Process: 017 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.

Process: 020 is located at 1, Building 1 - Paint Line 1 roof vent. One of five roof vents over Paint Line 1 that is primarily designed to remove heat from the area over the bake oven. Emissions through the roof vent should be minimal.

Process: 022 is located at 1, Building 1 - Paint Line 1 smoke hood. A hood over the inlet/outlet to the bake oven. The purpose of the smoke hood is to vent heated air from the oven. The exhaust is vented through thermal oxidizers.

Process: 024 is located at 1, Building 1 - Paint Line 1 flash off tunnel. Following the application of coatings in the paint spray booths, the parts are conveyed through a flash off area. A vent over the area exhausts any emissions that occur during flash off through thermal oxidizers.

Process: E01 is located at 1, Building 1 - Thermal oxidizer natural gas burner. A natural gas fired burner for the Model 30 oxidizer with a maximum rated capacity of 2.81 mmBtu/hr.

Process: E13 is located at 1, Building 1 - Thermal oxidizer natural gas burner. A natural gas fired burner for the Model 25 oxidizer with a maximum rated capacity of 2.7 mmBtu/hr.

Emission unit U10008 - Anodize line solution tanks 12A and 12B. 8,000 gallon solution tanks.



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Emission unit U10008 is associated with the following emission points (EP):

1008A

Process: 027 is located at 1802, Building 2 - Tanks 12A and 12B are both 8,000 gallon solution tanks used in the aluminum anodize process. Racked parts are immersed in the sulfuric anodizing baths in order to impart a hard coat to the parts prior to subsequent processing. The reactions that occur in the tanks result in the emission of liquid particulate. The emissions are controlled with a Viron PVC Mist Eliminator.

Emission unit U00036 - Four aging ovens and one homogenizing furnace. The aging ovens are natural gas fired Granco Clark units each with a maximum burner rating of 2 mmBtu/hr. The homogenizing furnace was installed in July 2005. The furnace is a natural gas fired Remelt Technologies unit with a maximum burner rating of 18 mmBtu/hr. The furnace is housed in a separate building located to the north of the main plant. The only emissions associated with the ovens and furnaces are generated from the combustion of the natural gas.

Emission unit U00036 is associated with the following emission points (EP):

00036, 00037, 00038, 00039, 00043, 00044

Process: E06 is located at 1, Building 1 - Aging Oven 1. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E07 is located at 1, Building 1 - Aging Oven 2. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E08 is located at 1, Building 1 - Aging Oven 3. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E09 is located at 1, Building 1 - Aging Oven 4. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E12 is located at 1, Building 3 - Remelt Technologies Homogenizing Furnace. Following casting, the aluminum logs are placed into a homogenizing furnace to reduce chemical separation of cast structures and improve workability. The furnace is heated with a natural gas fired burner with a maximum rated capacity of 18 mmBtu/hr. There are two exhaust stacks associated with this furnace since the furnace can travel to either of two locations.

Emission unit U10007 - Anodize line solution tanks 5 and 7. 8,000 gallon heated solution tanks.

Emission unit U10007 is associated with the following emission points (EP):

10007

Process: 026 is located at 1802, Building 2 - Tanks 5 and 7 are both 8,000 gallon solution tanks used in the aluminum anodize process. Racked parts are immersed in the tanks in order to etch the aluminum parts in an alkaline solution prior to subsequent processing. The tanks are heated with natural gas fired burners. Combustion emissions are exhausted separately. The reactions that occur in the tanks in conjunction with



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the heating of the solutions result in the emission of liquid particulate. The emissions are controlled with a roof mounted Viron FRP Horizontal scrubber.

Emission unit U00027 - Die shop tanks. Heated alkaline solution tanks in which aluminum is removed from extrusion dies. The tanks are heated with natural gas fired burners. The combustion emissions are exhausted with the process emissions.

Emission unit U00027 is associated with the following emission points (EP):  
00027

Process: 01C is located at 1, Building 1 - Solutions of caustic soda and water are heated using natural gas fired burners. Extrusion dies are immersed in the tanks in order to remove residual aluminum. The tanks have process ventilation. Emissions are in the form of liquid particulate. Emissions are controlled with a wet scrubber.

Process: F04 is located at 1, Building 1 - Natural gas fired burners (4) for the solution tanks. The combustion emissions are exhausted through the solution tanks stack. The maximum rated capacity of each burner is 1.0 mmBtu/hr.

Emission unit U30002 - Acid pretreatment shower for extrude aluminum parts prior to painting in Paint Line 2. Parts are sprayed with an acid solution as they pass through on a conveyor.

Emission unit U30002 is associated with the following emission points (EP):  
30002

Process: 302 is located at 1, Building 1 - Extruded aluminum parts are sprayed with an acid pretreatment shower prior to painting, resulting in the emission of liquid particulate through the stack.

Emission unit U00017 - Acid pretreatment shower for extruded aluminum parts prior to painting in Paint Line 1. Parts are sprayed with an acid solution as they pass through on a conveyor.

Emission unit U00017 is associated with the following emission points (EP):  
00017

Process: 013 is located at 1, Building 5 - Extruded aluminum parts are sprayed with an acid pretreatment shower prior to painting resulting in the emission of liquid particulate through the steam vent that is located at the outlet to the shower system. The acid solution is drawn from a 2,400 gallon tank maintained at 120 F. The spray nozzle flow is 2.8 gallons per minute.

**Title V/Major Source Status**

KEYMARK CORP PLANT is subject to Title V requirements. This determination is based on the following information:

Keymark Corporation is considered to be a major facility because the facility's potential to emit various hazardous air pollutants, carbon monoxide, and volatile organic compounds exceeds the major facility threshold for those contaminants.



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**Program Applicability**

The following chart summarizes the applicability of KEYMARK CORP PLANT with regards to the principal air pollution regulatory programs:

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

**NOTES:**

**PSD** Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - 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 231-5, 231-6) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 201-6) - regulations which



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mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

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

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - 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**

3354

ALUMINUM EXTRUDED PRODUCTS

**SCC Codes**

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

**SCC Code**

**Description**

1-02-006-02

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL  
 INDUSTRIAL BOILER - NATURAL GAS  
 10-100 MMBtu/Hr

1-02-006-03

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL  
 INDUSTRIAL BOILER - NATURAL GAS  
 Less Than 10 MMBtu/Hr

3-04-001-14

SECONDARY METAL PRODUCTION  
 SECONDARY METAL PRODUCTION - ALUMINUM  
 Pouring/Casting



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3-99-999-94	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified
4-02-008-10	SURFACE COATING OPERATIONS COATING OVEN - GENERAL General
4-02-025-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Coating Operation
4-02-025-99	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Other Not Classified

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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.

<b>Cas No.</b>	<b>Contaminant</b>	<b>PTE lbs/yr</b>	<b>PTE tons/yr</b>	<b>Actual lbs/yr</b>	<b>Actual tons/yr</b>
001746-01-6	2,3,7,8- TETRACHLORODI BENZO-P- DIOXIN	0.0000315			
000078-59-1	2-CYCLOHEXEN- 1-ONE,3,5,5- TRIMETHYL	15576			
000108-10-1	2-PENTANONE, 4-METHYL	58768			
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	1710			
007440-36-0	ANTIMONY	38			
000071-43-2	BENZENE	4			
000098-82-8	BENZENE, (1- METHYLETHYL)	2124			
000106-46-7	BENZENE, 1,4- DICHLORO-	2			
007440-43-9	CADMIUM	88			
000630-08-0	CARBON MONOXIDE	129814			
007440-47-3	CHROMIUM	450			



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007440-48-4	COBALT	54
000131-11-3	DIMETHYL PHTHALATE	56644
000100-41-4	ETHYLBENZENE	18410
000050-00-0	FORMALDEHYDE	2240
000110-00-9	FURAN C4H4O	0.0000315
068606-21-3	GLYCOLS, C10- 16	149806
000110-54-3	HEXANE	2790
007647-01-0	HYDROGEN CHLORIDE	2380
007664-39-3	HYDROGEN FLUORIDE	232
007439-96-5	MANGANESE	0.473
000067-56-1	METHYL ALCOHOL	2124
000091-20-3	NAPHTHALENE	19826
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	42
0NY210-00-0	OXIDES OF NITROGEN	154906
0NY075-00-0	PARTICULATES	38546
0NY075-00-5	PM-10	38456
007446-09-5	SULFUR DIOXIDE	930
000108-88-3	TOLUENE	128420
0NY100-00-0	TOTAL HAP	238000
0NY998-00-0	VOC	707376
001330-20-7	XYLENE, M, O & P MIXT.	238652

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

An emergency, as defined by 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 be demonstrated 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 permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner 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 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



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emissions, and 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 upset provision contained in any applicable requirement.

**Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

**Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)**

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

**Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)**

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**

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

**Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**

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

**Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**

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

**Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)**



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

**Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)**

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

**Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)**

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

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

**Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(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.



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iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

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

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

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department



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upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Regulatory Analysis**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
FACILITY	ECL 19-0301	87	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-A	36	Subpart A - General Provisions apply to all NESHAP affected sources
FACILITY	40CFR 63- MMMM.3890(c)(2)	37	Misc. Metal Parts & Products Surface Coating MACT - Alternative facility specific emission limits
FACILITY	40CFR 63-MMMM.3891(c)	38	Misc. Metal Parts & Products Surface Coating NESHAP - Compliance options - Add-on Controls
FACILITY	40CFR 63-MMMM.3892(b)	39	Misc. Metal Parts & Products Surface Coating NESHAP - Operating limits for add-on control devices
U-00034	40CFR 63-MMMM.3892(b)	84	Misc. Metal Parts & Products Surface Coating NESHAP - Operating limits for add-on control devices
U-00035/-/E01/E001A	40CFR 63-MMMM.3892(b)	85	Misc. Metal Parts & Products Surface Coating NESHAP - Operating limits for add-on control devices
U-00035/-/E13/E0013	40CFR 63-MMMM.3892(b)	86	Misc. Metal Parts & Products Surface Coating NESHAP - Operating limits for add-on control devices
FACILITY	40CFR 63-MMMM.3893(b)	40	Misc. Metal Parts & Products Surface Coating NESHAP - Work Practice Standards for add-on controls
FACILITY	40CFR 63- MMMM.3900(a)(2)	41	Misc. Metal Parts & Products Surface Coating NESHAP - General requirements
FACILITY	40CFR 63-	42	Misc. Metal Parts &



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	MMMM.3900(a)(2)		Products Surface Coating NESHAP - General Requirements
FACILITY	40CFR 63- MMMM.3900(a)(2)	43	Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements
FACILITY	40CFR 63-MMMM.3900(b)	44	Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements
FACILITY	40CFR 63-MMMM.3900(c)	45	Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements
FACILITY	40CFR 63-MMMM.3901	46	Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements
FACILITY	40CFR 63-MMMM.3920(a)	47	Misc. Metal Parts & Products Surface Coating NESHAP - Reporting Requirements
FACILITY	40CFR 63-MMMM.3920(b)	48	Misc. Metal Parts & Products Surface Coating NESHAP - Reporting requirements
FACILITY	40CFR 63-MMMM.3920(c)	49	Misc. Metal Parts & Products Surface Coating NESHAP - Reporting requirements
FACILITY	40CFR 63-MMMM.3930(a)	50	Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-MMMM.3930(b)	51	Misc. Metal Parts and Products Surface Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63- MMMM.3930(c)(4)	52	Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-MMMM.3930(d)	53	Misc. Metal Parts and Products Surface Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-MMMM.3930(e)	54	Misc. Metal Parts and Products Surface Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-MMMM.3930(f)	55	Misc. Metal Parts and Products Surface Coating NESHAP - Recordkeeping requirements



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FACILITY	40CFR 63-MMMM.3930(g)	56	Misc. Metal Parts and Products Surface Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-MMMM.3930(k)	57	Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-MMMM.3931	58	Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-MMMM.3963(a)	59	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
FACILITY	40CFR 63-MMMM.3963(b)	60	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
FACILITY	40CFR 63-MMMM.3963(c)	61	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
FACILITY	40CFR 63-MMMM.3963(d)	62	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
FACILITY	40CFR 63-MMMM.3963(e)	63	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
FACILITY	40CFR 63-MMMM.3963(f)	64	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
FACILITY	40CFR 63-MMMM.3964(b)	65	Misc. Metal Parts and Products Surface Coating NESHAP - Performance test requirements
FACILITY	40CFR 63-MMMM.3967(a)	66	Misc. Metal Parts & Products Surface Coating NESHAP - Establishing operating limits for add-on control device
FACILITY	40CFR 63-MMMM.3967(f)	67	Misc. Metal Parts & Products Surface Coating NESHAP - emission capture system and add-on control device operating limits
FACILITY	40CFR 63-MMMM.3968(a)	68	Misc. Metal Parts &



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FACILITY	40CFR 63-MMMM.3968(b)	69, 70	Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems
FACILITY	40CFR 63-MMMM.3968(c)	71, 72, 73	Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems
FACILITY	40CFR 63-MMMM.3968(g)	74, 75, 76, 77	Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	88	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 78, 79	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	1 -1	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements -



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FACILITY	6NYCRR 201-6.4(d)(4)	22				Deviations and Noncompliance Compliance Schedules
FACILITY	6NYCRR 201-6.4(e)	6				- Progress Reports
FACILITY	6NYCRR 201-6.4(f)	23				Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17				Operational Flexibility
FACILITY	6NYCRR 202-1.1	18				Off Permit Changes
FACILITY	6NYCRR 202-2.1	7				Required emissions tests.
FACILITY	6NYCRR 202-2.5	8				Emission Statements - Applicability
FACILITY	6NYCRR 211.1	24				Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	89				General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212-1.6(a)	1	-2			General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-2.3(b)	1	-5, 1	-6, 1	-7	Limiting of Opacity
FACILITY	6NYCRR 212-2.4(b)	1	-3, 1	-4		Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 215.2	9				Control of Particulate from New and Modified Process Emission Sources
U-00034	6NYCRR 228-1.3(a)	80				Open Fires - Prohibitions
U-00034	6NYCRR 228-1.3(b)(1)	81				Surface Coating General Requirements- Opacity
U-00034	6NYCRR 228-1.3(d)	82				General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3(e)	30				Surface Coating General Requirements- Handling, storage and disposal
FACILITY	6NYCRR 228-1.4(b)(4)	31				Surface Coating - General control requirements (Class A & most B)
FACILITY	6NYCRR 228-1.5(b)	32				Miscellaneous Metal Parts Coatings
U-00034	6NYCRR 228-1.6(a)	83				Natural gas incineration of VOCs
FACILITY	6NYCRR 228-1.6(d)	33				Surface coating VOC analysis.
FACILITY	6NYCRR 228-1.6(e)	34				Surface coating control equipment test methods
FACILITY	6NYCRR 228-1.6(h)	35				Surface coating control efficacy test methods
						Records reporting and maintaining

**Applicability Discussion:**

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



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ECL 19-0301

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.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 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.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 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



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facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be



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subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

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

6 NYCRR 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.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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.

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, KEYMARK CORP PLANT has been determined to be subject to the following regulations:

40 CFR 63.3890 (c) (2)

This section gives the facility owner or operator the option of calculating and complying with a facility specific emission limit in order to demonstrate compliance with the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3891 (c)



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This section outlines the requirements that the facility must meet in order to demonstrate compliance with the emission rate with add-on controls compliance option allowed under 40 CFR 63 Subpart MMMM.

40 CFR 63.3892 (b)

This section requires that facilities using the emission rate with add-on controls compliance option allowed under 40 CFR 63 Subpart MMMM to comply with the operational limitations presented in Table 1 of Subpart MMMM. The operational limits must be established during a performance test as described in 40 CFR 63.3967.

40 CFR 63.3893 (b)

This section contains the various work practice standards that must be met by facilities that are subject to the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3900 (a) (2) (i)

This section outlines the general requirements for facilities that are subject to the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3900 (a) (2) (ii)

This section outlines the general requirements for facilities that are subject to the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3900 (a) (2) (iii)

This section outlines the general requirements for facilities that are subject to the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3900 (b)

This section requires the facility owner or operator to operate the emission source subject to the requirements of 40 CFR 63 Subpart MMMM in compliance with the requirements of 40 CFR 63.6(e)(1)(i) at all times.

40 CFR 63.3900 (c)

This section requires the facility owner or operator to develop and implement a written start-up, shutdown and malfunction plan that meets the requirements of 40 CFR 63.6(e)(3).

40 CFR 63.3901



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This requirement refers to Table 2 of the Subpart which outlines the various general requirements in 40 CFR 63 Subpart A (63.1 through 63.15) that apply to this facility.

40 CFR 63.3920 (a)

This section outlines the required content of semiannual reports submitted by the facility owner or operator.

40 CFR 63.3920 (b)

This section states that performance test reports must be submitted within 60 days of the completion of testing at the facility.

40 CFR 63.3920 (c)

This section requires facilities using the emission rate with add-on controls compliance option to submit start-up, shutdown, and malfunction reports as part of the semiannual compliance report, if applicable.

40 CFR 63.3930 (a)

This section requires the facility owner or operator to keep a copy of each notification and report submitted to the Department in order to demonstrate compliance with 40 CFR 63 Subpart M MMM at the facility.

40 CFR 63.3930 (b)

This section requires the facility to maintain a copy of all manufacturer's data and other necessary information used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and the volume fraction of coating solids for each coating at the facility.

40 CFR 63.3930 (c) (4)

This section outlines the records that must be kept by facilities that are using the emission rate with add-on controls option to comply with the requirements of 40 CFR 63 Subpart M MMM.

40 CFR 63.3930 (d)

This section requires the facility owner or operator to maintain a record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each semiannual compliance period.

40 CFR 63.3930 (e)

This section requires the facility owner or operator to maintain a record of the mass fraction of organic



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HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

40 CFR 63.3930 (f)

This section requires the facility owner or operator to maintain a record of the volume fraction of coating solids for each coating used during each compliance period.

40 CFR 63.3930 (g)

This section requires the facility owner or operator to maintain a record of the density of each coating, thinner and/or other additive, and cleaning material used during each compliance period.

40 CFR 63.3930 (k)

This section outlines the records that must be kept by facilities using the emission rate with add-on controls option to demonstrate compliance with 40 CFR 63 Subpart MMMM.

40 CFR 63.3931

This regulation specifies the length of time records must be kept under Subpart MMMM

40 CFR 63.3963 (a)

This section outlines the methods the facility owner or operator must use in order to demonstrate compliance with the applicable emission limit in 40 CFR 63.3890.

40 CFR 63.3963 (b)

This section states that an emission rate exceeding the applicable emission rate specified in 40 CFR 63.3890 is a deviation that must be reported as described in 40 CFR 63.3910(c)(6) and 63.3920(a)(7).

40 CFR 63.3963 (c)

This section outlines the methods used to demonstrate continuous compliance with each operating limit that applies to the facility.

40 CFR 63.3963 (d)

This section outlines the procedures that must be followed if a bypass line is opened.

40 CFR 63.3963 (e)



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This section state that the facility must demonstrate continuous compliance with the applicable work practice standards.

40 CFR 63.3963 (f)

This section requires the facility owner or operator to identify each coating operation for which the emission rate with add-on controls compliance option was used in each semiannual report.

40 CFR 63.3964 (b)

This section outlines the requirements for performance tests conducted on the emission capture system.

40 CFR 63.3967 (a)

This section outlines the methods the facility owner or operator must use to establish the operating limits for a thermal oxidizer installed to comply with the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3967 (f)

This section describes the methods that the facility owner or operator must use to establish operating limits for the emissions capture system required by 40 CFR 63 Subpart MMMM.

40 CFR 63.3968 (a)

This section outlines the installation, operation, and maintenance requirements for continuous parameter monitoring systems installed pursuant to 40 CFR 63 Subpart MMMM.

40 CFR 63.3968 (b)

This section describes the requirements for emission capture systems that contain a bypass line.

40 CFR 63.3968 (c)

This section outlines the requirements for thermal and catalytic oxidizers used to demonstrate compliance with the emission rate with add-on controls compliance option under 40 CFR 63 Subpart MMMM.

40 CFR 63.3968 (g)

This section outlines the requirements for the emissions capture system monitoring system.

40 CFR Part 63, Subpart A



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The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40 CFR 63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that describe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

6 NYCRR 201-6.4 (f)

This section describes the operational flexibility protocol proposed by the facility. The protocol will allow the facility owner or operator to make certain changes at the facility without the need for a permit modification. Changes made pursuant to the protocol must be approved by the Department, and will be rolled into the permit during the next renewal or modification.

6 NYCRR 211.1

This regulation requires that 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.

6 NYCRR 212-1.6 (a)

This provision requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.3 (b)

Table 4 of 212-2.3 describes the reduction in emissions required for a non-criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent



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or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b) (1)

This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.3 (e)

This regulation outlines the general control requirements for emissions of volatile organic compounds related to surface coating.

6 NYCRR 228-1.4 (b) (4)

This section contains the VOC content limits for miscellaneous metal parts coatings.

6 NYCRR 228-1.5 (b)

This section describes the minimum control efficiency for add-on control devices used to demonstrate compliance with Part 228-1.

6 NYCRR 228-1.6 (a)

This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the regulation.

6 NYCRR 228-1.6 (d)

This section requires the facility owner or operator to use test methods acceptable to the Department in order to determine the overall removal efficiency of control devices used to demonstrate compliance with Part 228-1.

6 NYCRR 228-1.6 (e)



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This section requires the facility owner or operator to follow the applicable notification requirements, protocol requirements, and test procedures as described in 6 NYCRR Part 202 when conducting testing pursuant to 6 NYCRR Part 228-1.

6 NYCRR 228-1.6 (h)

This citation requires the facility owner or operator to divulge any information or record showing noncompliance with the requirements of the regulation to the Department within 30 days and to maintain this information on the premises for a period of 5 years.

**Compliance Certification**

**Summary of monitoring activities at KEYMARK CORP PLANT:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	monitoring of process or control device parameters as surrogate
U-00034	84	monitoring of process or control device parameters as surrogate
U-00035/-/E01/E001A	85	monitoring of process or control device parameters as surrogate
U-00035/-/E13/E0013	86	monitoring of process or control device parameters as surrogate
FACILITY	40	record keeping/maintenance procedures
FACILITY	45	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
FACILITY	48	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
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FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	record keeping/maintenance procedures
FACILITY	67	monitoring of process or control device parameters as surrogate
FACILITY	68	record keeping/maintenance procedures
FACILITY	69	record keeping/maintenance procedures
FACILITY	70	monitoring of process or control device parameters as surrogate



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FACILITY	71	record keeping/maintenance procedures
FACILITY	72	record keeping/maintenance procedures
FACILITY	73	record keeping/maintenance procedures
FACILITY	74	record keeping/maintenance procedures
FACILITY	75	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	1-2	monitoring of process or control device parameters as surrogate
FACILITY	1-5	work practice involving specific operations
FACILITY	1-6	record keeping/maintenance procedures
FACILITY	1-7	record keeping/maintenance procedures
FACILITY	1-3	intermittent emission testing
FACILITY	1-4	record keeping/maintenance procedures
U-00034	80	monitoring of process or control device parameters as surrogate
U-00034	81	record keeping/maintenance procedures
U-00034	82	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
U-00034	83	record keeping/maintenance procedures
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	35	record keeping/maintenance procedures

**Basis for Monitoring**

The acid and alkaline pretreatment showers (U-00016 and U-00017) operated at Keymark Corporation are subject to the requirements of 6 NYCRR Part 212. The contaminants emitted by these emission units have been assigned the following environmental ratings by the Department:

- Chromic acid – A
- Hydrofluoric acid – B
- Phosphoric acid – B
- Sodium hydroxide – B

Keymark is required to demonstrate that these emissions will not exceed the applicable short term or annual guideline concentration as described in 6 NYCRR Part 212-2.3(b). Accordingly, Keymark has completed air dispersion modeling analysis for each contaminant based on the results of a stack test conducted on the existing pretreatment showers on 7/29/2015. The proposed shower design is likely to have reduced emissions of the contaminants listed above due to the placement of the emission points as compared to the old design. As a result, the modeling analysis performed by the facility using the 2015 stack test data is likely to be conservative.

Since the chromic acid used by this facility includes both chromium compounds and hexavalent chromium, Keymark is required to demonstrate that they meet the mass emission threshold in 6 NYCRR Part 212-2.2 or the annual guideline concentration for those contaminants. The facility’s emissions exceed both of these values. Accordingly, the department performed a T-BACT analysis for this process. Due to the conservative approach used in the modeling and the difference in design between the proposed and existing shower process, the department has determined that the actual concentration of these compounds emitted and the modeled impact are likely less than what is being reported. Further, the shower has been designed to



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minimize emissions in a reasonable manner. Accordingly, T-BACT has been applied to this process, and no further action by Keymark is necessary at this time.

In order to ensure that emissions of chromium compounds and hexavalent chromium do not exceed the level used in the T-BACT determination, this permit contains a condition limiting the amount of chromic acid that may be used at the facility on an annual basis. The facility owner or operator will maintain chromic acid usage records and is required to perform a new dispersion modeling analysis if the usage exceeds the value described in the permit for two consecutive months.