

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00025/00059

Renewal Number: 2

01/17/2020

Facility Identification Data

Name: KENNEDY VALVE DIV MC WANE INC

Address: 1021 E WATER ST

ELMIRA, NY 14901

Owner/Firm

Name: MCWANE INC

Address: 2900 US RTE 280

BIRMINGHAM, AL 35223, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: KIMBERLY A MERCHANT

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AVON, NY 14414-9519

Phone:5852262466

Division of Air Resources:

Name: ZACHARY TENNIES

Address: 6274 Avon-East Lima Rd

Avon, NY 14414-9519

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Air Permitting Contact:

Name: MICHAEL BOWLES

Address: KENNEDY VALVE DIV MCWANE INC

1021 E WATER ST

ELMIRA, NY 14901

Phone:6077342211

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 is Renewal 2, Modification 0 of the facility Air Title V permit. Permit renewal 2 incorporates the following changes made to the facility during the term of the prior permit in accordance with the Operational Flexibility provisions:

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- Addition of two Isocure core making machines under Process 013, Emission Source S0038. The two new core making machines are controlled using the existing Dakota Scrubber (Emission Source S0024) which has been modified to accommodate the additional exhaust air flow.
- Replacement of existing Isocure core making machine with a new machine under Emission Source S0038.
- Addition of a gas metal arc welding process as Process 024, Emission Source S0034 under existing Emission Unit E-00006. This process is controlled using a new dust collector (Emission Source S0092.)

Permit renewal 2 also makes the following additional changes to the facility Air Title V permit:

- Emission Source S0038 has been added as part of this permit renewal to differentiate the Isocure and Novaset core making machines (previously both permitted under Emission Source S0021.) Emission Source S0038 includes the two new core making machines identified above and three existing core making machines. The five Novaset core making machines remain permitted under Emission Source S0021.
- A change to the opacity monitoring requirements under 40 CFR 63.10895(e) to more accurately reflect the monitoring methods and frequency required under the provisions of 40 CFR 63, Subpart *ZZZZ*.
- Replacement of stainless-steel rotary screen for the sand screening and mixing process (previously Process 007, Emission Source S0015.) Emissions from the new rotary screen are controlled using a new dust collection system and are now exhausted back into the building and do not emit to the outdoor atmosphere. Therefore, Process 007 and Emission Source S0015 are no longer included as permitted processes or sources.
- Minor corrections or changes to facility permit conditions.

Attainment Status

KENNEDY VALVE DIV MC WANE INC is located in the town of ELMIRA in the county of CHEMUNG.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
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Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)

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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:

Kennedy Valve manufactures products for use in waterworks distribution, potable and wastewater treatment and fire protection systems (NAICS 332911). Products include fire hydrants, indicator posts and various types of valves. Processes include an iron foundry, casting of metal parts, machining operations and surface coating using both liquid and powder coatings.

Permit Structure and Description of Operations

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

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

KENNEDY VALVE DIV MC WANE INC is defined by the following emission unit(s):

Emission unit E00001 - Melting: Scrap metal is preheated via a natural gas fired preheater then charged into one of three coreless induction melting furnaces. Molten metal is tapped from the furnace into a ladle and alloys may be added to achieve the desired chemistry.

Emission unit E00001 is associated with the following emission points (EP):
00088

Process: 001 is located at MELT DEPARTMENT, Building F - Scrap Preheating: Pig iron, returns, scrap steel, and machine cast is preheated using a natural gas-fired preheater prior to melting to a temperature of 1,100 degrees F.

Process: 002 is located at MELT DEPARTMENT, Building F - Iron Melting: Preheated metal scrap is

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melted using coreless induction furnaces. Alloys are added as needed for desired metal chemistry.

Process: 003 is located at MELT DEPARTMENT, Building F - Ductile Treatment: Magnesium is added to the treatment ladle as needed to make ductile iron.

Emission unit E00002 - Pouring and Cooling: A ladle containing molten metal is moved to the pouring line where the metal is poured into sand molds. From the pouring station, the filled molds travel by conveyor through the cooling zone.

Emission unit E00002 is associated with the following emission points (EP):
00067, 00068, 00069, 00070, 00071, 00090, 00091

Process: 004 is located at POURING LINE, Building E - Iron Pouring: The ladle is moved to the pouring line where molten metal is poured into sand molds with the cores.

Process: 005 is located at COOLING LINE, Building E - Mold Cooling: Sand molds containing molten iron are conveyed in cars on moving rollers while the iron solidifies.

Emission unit E00003 - Shakeout, Sand Handling and Mold Making: Cooled molds are transferred to a rotary shakeout machine and rotary drum to separate the castings from the molds. Sand is screened and transferred to the muller where it is reused in making molds.

Emission unit E00003 is associated with the following emission points (EP):
00089

Process: 006 is located at SHAKEOUT AREA, Building D - Casting Shakeout: Sand molds containing solidified iron castings are directed to a shakeout machine which separates the sand from the castings. The castings are then conveyed to a rotary drum for further sand removal.

Process: 008 is located at MOLD LINE, Building D - Mold Making: Recycled sand from the sand system is used to produce sand molds.

Emission unit E00005 - Core Making: Sand cores are made in one of three methods; shell core, Novaset or Isocore. Cores are washed in a water based material to improve surface characteristics.

Emission unit E00005 is associated with the following emission points (EP):
00085

Process: 011 is located at MOLD DEPARTMENT, Building D - Core making: Resin coated sand is machines. The sand is metered into each machine where heat is applied to set the cores. The cores are washed in a water based material to improve surface properties.

Process: 012 is located at MOLD DEPARTMENT, Building D - Core making: Uncoated sand is metered

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into five core machines where the binder chemicals are mixed, an ester-based co-reactant and pressure are used to form the cores. The cores are washed in a water based material to improve surface properties.

Process: 013 is located at MOLD DEPARTMENT, Building D - Core making: Uncoated sand is pneumatically conveyed into five core machines where an amine catalyst is used to activate the binder and cure the cores. The cores are washed in a water based material to improve surface properties and conveyed through one of three ovens associated with the Leampe machines.

Emission unit E00006 - Finishing: After castings are cleaned and welded as necessary, they are surface coated as needed in one of two powder coat booths or spray booths. The coating booths are equipped with fabric filters to reduce emissions of particulate matter.

Emission unit E00006 is associated with the following emission points (EP):
00056, 00060

Process: 015 is located at Building H - Spray Painting: Castings requiring custom paint are painted in two spray booths each with a dry filter and exhaust fan.

Process: 024 is located at Building H - Industrial Welding: Castings are spot welded using a gas metal arc welding (GMAW) process.

Title V/Major Source Status

KENNEDY VALVE DIV MC WANE INC is subject to Title V requirements. This determination is based on the following information:

The facility is a major source for carbon monoxide, VOC, and particulate matter emissions. Potential facility emissions of carbon monoxide and particulate matter exceed the 100 tons per year major source thresholds for these pollutants. Potential facility emissions of VOCs exceeds 50 tons per year which is the major source threshold for the Ozone Transport Region.

Program Applicability

The following chart summarizes the applicability of KENNEDY VALVE DIV MC WANE INC with regards to the principal air pollution regulatory programs:

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

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TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
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 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 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 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.

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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

3321	GRAY IRON FOUNDRIES
3491	INDUSTRIAL VALVES

SCC Codes

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

SCC Code

Description

3-04-003-03	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-20	Electric Induction Furnace SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-25	Pouring/Casting SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-31	Castings Cooling SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-70	Casting Shakeout SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-71	Shell Core Machine SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES Core Machines/Other

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3-04-003-99	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES Other Not Classified
3-09-052-76	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - GAS METAL ARC WELDING (GMAW) ERNICRMO ELECTRODE - GAS METAL ARC WELDING

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.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000108-38-3	1,3 DIMETHYL BENZENE		0.595		
000090-12-0	1- METHYLNAPHTHA LENE		0.215		
000091-57-6	2-METHYL NAPHTHALENE		0.38		
000095-48-7	2-METHYL- PHENOL		2.48		
000996-35-0	2- PROPANAMINE, N,N-DIMETHYL		0.384		
000075-07-0	ACETALDEHYDE		1.21	530.2	
000062-53-3	ANILINE		4.9	2137.2	
007440-36-0	ANTIMONY		0.008		
007440-38-2	ARSENIC		0.0016	0.709	
000121-69-7	BENZENAMINE, N, N-DIMETHYL		1.139		
000071-43-2	BENZENE	19800		8615.5	
000098-82-8	BENZENE, (1- METHYLETHYL)		0.025		
000095-47-6	BENZENE, 1,2- DIMETHYL		4.216		
007440-41-7	BERYLLIUM		7.0E-6	0.003	
007440-43-9	CADMIUM		0.007	3.059	
000630-08-0	CARBON MONOXIDE		542.5		
007440-47-3	CHROMIUM		0.049		

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007440-48-4	COBALT		0.668	291.4
000100-41-4	ETHYLBENZENE		0.827	
000050-00-0	FORMALDEHYDE		0.438	191.1
007439-92-1	LEAD		0.011	4.67
007439-96-5	MANGANESE		0.199	86.8
007439-97-6	MERCURY		0.0001	0.035
000078-93-3	METHYL ETHYL KETONE		0.0017	
000926-63-6	N,N- DIMETHYLPROPY LAMINE		0.384	
000091-20-3	NAPHTHALENE		1.16	
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		0.14	61.12
0NY210-00-0	OXIDES OF NITROGEN		14.41	
0NY075-00-0	PARTICULATES		648.6	
000108-95-2	PHENOL	19800		
000108-39-4	PHENOL, 3- METHYL		0.784	
0NY075-00-5	PM-10		619.2	
007782-49-2	SELENIUM		0.003	
007446-09-5	SULFUR DIOXIDE		3.96	
000108-88-3	TOLUENE		7.58	
0NY100-00-0	TOTAL HAP	49800		
0NY998-00-0	VOC		120.3	
001330-20-7	XYLENE, M, O & P MIXT.		0.037	
000106-42-3	XYLENE, PARA-		0.022	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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 B: 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 C: 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.

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- Item D: 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 E: 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 F: 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 G: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item H: 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 I: 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;

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- 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 J: 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.
- 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 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)

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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: 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 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_02

Item B: 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.

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description

FACILITY	ECL 19-0301	72	Powers and Duties of the Department with respect to air
FACILITY	40CFR 60-IIII	35	pollution control Standards of Performance for Stationary
E-00006/-/015	40CFR 63- MMMM.3890(b)(1)	60	Compression Ignition Internal Combustion Engines
E-00006/-/015	40CFR 63-MMMM.3891(b)	61	Misc. Metal Parts & Products Surface Coating NESHAP - Emission Limits - Existing General Use Coating
E-00006/-/015	40CFR 63-MMMM.3901	62	Misc. Metal Parts & Products Surface Coating Compliance Options - Emission rate without add-on controls
E-00006/-/015	40CFR 63-MMMM.3910(c)	63	Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements
E-00006/-/015	40CFR 63-MMMM.3920(a)	64	Misc. Metal Parts & Products Surface Coating NESHAP - Reporting requirements
E-00006/-/015	40CFR 63-MMMM.3930	65	Misc. Metal Parts & Products Surface Coating - Requirements
E-00006/-/015	40CFR 63-MMMM.3931	66	Misc. Metal Parts & Products Surface Coating - Recordkeeping for the emission rate without add-on controls option
E-00006/-/015	40CFR 63-MMMM.3950	67	Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements
E-00006/-/015			Misc. Metal Parts &

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			Products Surface Coating MACT - Initial Compliance Demonstration
E-00006/-/024	40CFR 63- XXXXXX.11516(f)	68	Nine Metal Fabrication and Finishing Area Source NESHAP - Welding Standards
E-00006/-/024	40CFR 63- XXXXXX.11519(a)	69	Nine Metal Fabrication and Finishing Area Source NESHAP -
E-00006/-/024	40CFR 63- XXXXXX.11519(b)	70	Notifications Nine Metal Fabrication and Finishing Area Source NESHAP - Reporting
E-00006/-/024	40CFR 63- XXXXXX.11519(c)	71	Nine Metal Fabrication and Finishing Area Source NESHAP -
FACILITY	40CFR 63-ZZZZ	36	Recordkeeping Reciprocating Internal Combustion Engine (RICE) NESHAP
E-00001	40CFR 63- ZZZZ.10885(a)	41	Restricted Metallic Scrap Management Program
FACILITY	40CFR 63- ZZZZ.10885(b)	37	Use Of Scrap That Does Not Contain Motor Vehicle Scrap Management Practices For Binder Formulations
E-00005	40CFR 63-ZZZZZ.10886	52	Capture And Control Requirements for New And Existing Large Foundries
E-00001	40CFR 63- ZZZZ.10895(b)	42	Particulate Matter Emission Limit For Existing Large Iron And Steel Foundries
E-00001/00088	40CFR 63- ZZZZ.10895(c)	49	Fugitive Emission Requirements For Large Iron And Steel Foundries
FACILITY	40CFR 63- ZZZZ.10895(e)	38	Operation and Maintenance requirements for large iron and steel foundries
E-00001	40CFR 63- ZZZZ.10896(a)	43	Inspection Requirements For Fabric Filters At Large Iron And Steel Foundries
E-00001	40CFR 63- ZZZZ.10897(a)	44	Requirements For Bag Leak Detectors At Large Iron And Steel Foundries
E-00001	40CFR 63- ZZZZ.10897(d)	45	Chemical accident prevention provisions Protection of Stratospheric Ozone -
FACILITY	40CFR 68	19	
FACILITY	40CFR 82-F	20	

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FACILITY	6NYCRR 200.6	1	recycling and emissions reduction
FACILITY	6NYCRR 200.7	10	Acceptable ambient air quality.
FACILITY	6NYCRR 201-1.4	73	Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	11	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	12	Recycling and Salvage
			Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2	21	Exempt Activities
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	22, 39, 40	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)	16	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 - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	23	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(2)	24	Operational Flexibility - Protocol
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.4(g)	25	Permit Shield
FACILITY	6NYCRR 201-7.1	26	Emission Capping in Facility Permits
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	74	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	30, 31	General Prohibitions - visible emissions limited.
E-00005/-/013	6NYCRR 212-2.3(b)	75	State Air Program

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E-00005/-/013/S0024	6NYCRR 212-2.3(b)	76	Non-Criteria air contaminants subject Table 4 State Air Program Non-Criteria air contaminants subject Table 4
E-00006/-/024	6NYCRR 212-2.4(b)	77	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 216.3	32	Particulate emissions.
E-00001/-/002/S0088	6NYCRR 216.3	46	Particulate emissions.
E-00001/-/002/S0090	6NYCRR 216.3	47	Particulate emissions.
E-00001/00088	6NYCRR 216.3	48	Particulate emissions.
E-00003/-/006/S0089	6NYCRR 216.3	50	Particulate emissions.
E-00003/00089	6NYCRR 216.3	51	Particulate emissions.
FACILITY	6NYCRR 216.4	33	Opacity of emissions.
E-00006/-/015	6NYCRR 228-1.1(a)(3)	53	Once in always in
E-00006/-/015	6NYCRR 228-1.3(a)	54	Surface Coating General Requirements- Opacity
E-00006/-/015	6NYCRR 228-1.3(b)(1)	55	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3(c)	34	Surface Coating General Requirements- Prohibitions
E-00006/-/015	6NYCRR 228-1.3(d)	56	Surface Coating General Requirements- Handling, storage and disposal
E-00006/-/015	6NYCRR 228- 1.4(b)(4)(ii)	57	Misc. metal parts coatingsVOC content limits
E-00006/-/015	6NYCRR 228-1.6(a)	58	Surface coating VOC analysis.
E-00006/-/015	6NYCRR 228-1.6(c)	59	Surface coating access for sampling

Applicability Discussion:

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

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

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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 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.

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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) (4)

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 subject to an off permit change.

6 NYCRR 201-6.4 (g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

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.

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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, KENNEDY VALVE DIV MC WANE INC has been determined to be subject to the following regulations:

40 CFR 63.10885 (a) (1)

Requirements for restricted metallic scrap management program. These requirements list scrap items that are not allowed in parts of the facility that are regulated under this program.

40 CFR 63.10885 (b) (4)

This regulation reequires that the owner or operator must certify that scrap purchased does not contain motor vehicle scrap.

40 CFR 63.10886

Management Practices For Binder Formulations. These requirements restrict the use of methanol as a

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specific ingredient of the catalyst formulation.

40 CFR 63.10895 (b)

Capture And Control Requirements for New And Existing Large Foundries. Capture and collection systems are required unless furnace is part of an emissions averaging group.

40 CFR 63.10895 (c) (1)

This regulation specifies the particulate matter emission limit for existing large iron and steel foundries.

40 CFR 63.10895 (e)

This regulation specifies the fugitive emission requirements for large iron and steel foundries. Fugitive emissions are limited to 20% opacity except for one six minute average per hour of 30%.

40 CFR 63.10896 (a)

This condition sets forth the operation and maintenance requirements for this facility. specifically it calls for an operation and maintenance plan for all control devices at the facility.

40 CFR 63.10897 (a) (1)

This regulation specifies the inspection requirements for fabric filters at large iron and steel foundries. The owner or operator must conduct monthly visual inspections and inspect the inside of the baghouse every six months.

40 CFR 63.10897 (d)

This regulation specifies the requirements for bag leak detectors at large iron and steel foundries. The owner or operator may install, operate and maintain a bag leak detection system as an alternative to inspection requirements in 40CFR 63.10897(a)(1).

40 CFR 63.11516 (f)

This regulation specifies the management practices or fume control requirements for welding operations that use metal fabrication HAPs.

40 CFR 63.11519 (a)

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This regulation requires submission of a Notification of Compliance Status report for each affected source subject to 40 CFR 63, Subpart XXXXXX.

40 CFR 63.11519 (b)

This regulation requires submission of annual certification and compliance reports for each affected source subject to 40 CFR 63, Subpart XXXXXX.

40 CFR 63.11519 (c)

This regulation specifies the recordkeeping requirements for affected sources subject to 40 CFR 63, Subpart XXXXXX.

40 CFR 63.3890 (b) (1)

This regulation sets the emission limit for organic Hazardous Air Pollutants (HAPs) at existing general use affected sources.

40 CFR 63.3891 (b)

This regulation applies to a facility that has chosen to comply with the emission limit by meeting an "emission rate without add-on controls" by measuring the amount of organic HAPs per amount of coating solids used (in kg/l or lb/gal). This is one of three options available for compliance.

40 CFR 63.3901

This regulation 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 63.3910 (c)

This regulation describes the requirements for the content and submittal of a Notification of Compliance Status report for affected sources subject to 40 CFR 63, Subpart MMMM.

40 CFR 63.3920 (a)

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

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operator.

40 CFR 63.3930

This regulation defines the requirements for recordkeeping for each compliance option under Subpart MMMM

40 CFR 63.3931

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

40 CFR 63.3950

This regulation describes the period of initial compliance demonstration and the contents of the demonstration for the "Emission Rate without Add-On Controls" compliance option.

40 CFR Part 60, Subpart IIII

This regulation defines performance standards for compression ignition stationary reciprocating internal combustion engines.

40 CFR Part 63, Subpart ZZZZ

This regulation defines performance standards for stationary reciprocating internal combustion engines.

6 NYCRR 201-3.2

This regulation specifies the proof of eligibility criteria for determining whether an activity is exempt from the requirement to obtain an air permit or registration. It also provides the list of specific activities which are exempt.

6 NYCRR 201-6.4 (f) (2)

This regulation describes operational flexibility protocols which may 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 201-7.1

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

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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 212-2.3 (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)

This regulation limits 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 to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 216.3

This section contains the particulate emission limitations for various confined processes in the iron and/or steel industry.

6 NYCRR 216.4

This regulation limits the opacity of emissions from iron and/or steel processes.

6 NYCRR 228-1.1 (a) (3)

This regulation specifies that any coating line, which is or becomes subject to the requirements of this regulation, will remain subject to its requirements even if the reason they were subject later falls below the applicability threshold.

6 NYCRR 228-1.3 (a)

This regulation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

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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 (c)

This regulation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

6 NYCRR 228-1.3 (d)

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

6 NYCRR 228-1.4 (b) (4) (ii)

This regulation prohibits facilities that apply miscellaneous metal parts coatings and use compliant coatings as a compliance technique from using coatings with VOC contents, as applied, which exceed the limits specified in Table B4.

6 NYCRR 228-1.6 (a)

This regulation 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 (c)

This regulation permits Department personnel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirements.

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Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
E-00006/-/024	40 CFR Part 63, Subpart XXXXXX	Nine Metal Fabrication and Finishing Area Source NESHAP

Reason: Based on information submitted to the Department, facility usage of welding rod containing a metal fabrication HAP (MFHAP) will not exceed 2,000 pounds per year. Therefore, facility welding operations are not subject to the management practices under 40 CFR 63.11516(f)(3)-(8). Additionally, since facility surface coating operations do not use coatings containing a MFHAP, they are not subject to the requirements of 40 CFR 63, Subpart XXXXXX. The facility must maintain records of welding rod usage and coating content, as required elsewhere in this permit, to demonstrate that described above.

E-00006/-/024	40 CFR 63.11516 (f)	Nine Metal Fabrication and Finishing Area Source NESHAP - Welding Standards
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NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at KENNEDY VALVE DIV MC WANE INC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

E-00006/-/015	60	work practice involving specific operations
E-00006/-/015	61	record keeping/maintenance procedures
E-00006/-/015	63	record keeping/maintenance procedures
E-00006/-/015	64	record keeping/maintenance procedures

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E-00006/-/015	65	record keeping/maintenance procedures
E-00006/-/015	67	record keeping/maintenance procedures
E-00006/-/024	68	record keeping/maintenance procedures
E-00006/-/024	69	record keeping/maintenance procedures
E-00006/-/024	70	record keeping/maintenance procedures
E-00006/-/024	71	record keeping/maintenance procedures
E-00001	41	record keeping/maintenance procedures
E-00005	52	record keeping/maintenance procedures
E-00001	42	record keeping/maintenance procedures
E-00001/00088	49	intermittent emission testing
FACILITY	38	monitoring of process or control device parameters as surrogate
E-00001	43	record keeping/maintenance procedures
E-00001	44	record keeping/maintenance procedures
E-00001	45	record keeping/maintenance procedures
FACILITY	21	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	31	monitoring of process or control device parameters as surrogate
E-00005/-/013	75	record keeping/maintenance procedures
E-00005/-/013/S0024	76	monitoring of process or control device parameters as surrogate
E-00006/-/024	77	intermittent emission testing
E-00001/-/002/S0088	46	monitoring of process or control device parameters as surrogate
E-00001/-/002/S0090	47	monitoring of process or control device parameters as surrogate
E-00001/00088	48	intermittent emission testing
E-00003/-/006/S0089	50	monitoring of process or control device parameters as surrogate
E-00003/00089	51	intermittent emission testing
FACILITY	33	monitoring of process or control device parameters as surrogate
E-00006/-/015	53	record keeping/maintenance procedures
E-00006/-/015	54	monitoring of process or control device parameters as surrogate
E-00006/-/015	55	record keeping/maintenance procedures
E-00006/-/015	57	work practice involving specific operations
E-00006/-/015	58	record keeping/maintenance procedures

Basis for Monitoring

- **Condition 5** - 6 NYCRR 201-6.4(c)(3)(ii) - Semi-annual monitoring reports are required under the provisions of 6 NYCRR Part 201-6.4 and 40 CFR 70.
- **Condition 6** - 6 NYCRR 201-6.4(e) - Annual Compliance reports are required under the provisions of 6 NYCRR Part 201-6.4 and 40 CFR 70.
- **Condition 7** - 6 NYCRR 202-2.1 - Annual Emissions Statements are required under the provisions of 6 NYCRR Part 201-2 and 40 CFR 70.
- **Condition 21** - 6 NYCRR 201-3.2 – This condition lists the activities at the facility that are exempt from permitting, including the applicable exemption citation. This monitoring condition ensures the facility does not operate unauthorized emissions sources and documents permit-exempt activities.

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- **Condition 27** - 6 NYCRR 201-7.1 – Emissions capping and monitoring condition to limit individual HAP emissions below major source thresholds. Capped contaminants correspond to individual HAPs with potential emissions greater than 10 tons per year (i.e., benzene, phenol.) The monthly monitoring frequency is justified based on information submitted to the Department demonstrating that actual facility HAP emissions are less than the applicable HAP emission caps. Therefore, HAP emissions are not expected to exceed the caps during normal facility operation at current production levels and more frequent monitoring is not required. The emission factors and calculations methods are based on EPA guidance and must be approved by the Department.
- **Condition 28** - 6 NYCRR 201-7.1 – Emissions capping and monitoring condition to limit total HAP emissions below the major source threshold. The monthly monitoring frequency is justified based on information submitted to the Department demonstrating that actual facility HAP emissions are less than the applicable HAP emission caps. Therefore, HAP emissions are not expected to exceed the caps during normal facility operation at current production levels and more frequent monitoring is not required. The emission factors and calculations methods are based on EPA guidance and must be approved by the Department.
- **Condition 29** - 6 NYCRR 201-7.1 – Limits the total quantity of iron that can be melted annually to reduce facility HAP emissions. To comply with this limit the condition requires the facility to monitor and record the total quantity of iron melted on a monthly basis. The monthly monitoring frequency is justified since, based on previous compliance reports, that the quantity of iron melted is not expected to exceed this limit during normal facility operation at current production levels and more frequent monitoring is not required.
- **Condition 31** - 6 NYCRR 211.2 - This condition specifies the monitoring and recordkeeping to ensure compliance with the 20 percent opacity emissions limit. This monitoring condition ensures compliance with this limit through daily visual observations. The daily monitoring frequency for visual observations is justified because the rule does not specify a monitoring frequency and the condition requires performance of a Method 9 test if visible emissions are observed during two consecutive visual observations.
- **Condition 33** - 6 NYCRR 216.4 - This condition specifies the monitoring and recordkeeping to ensure compliance with the 20 percent opacity emissions limit. This monitoring condition ensures compliance with this limit through daily visual observations. The daily monitoring frequency for visual observations is justified because the rule does not specify a monitoring frequency and the condition requires performance of a Method 9 test if visible emissions are observed during two consecutive visual observations.
- **Condition 38** – 40 CFR 63.10895(e) - This condition specifies the monitoring and recordkeeping to ensure compliance with the 20 percent opacity emissions limit for fugitive emissions from affected iron and steel foundry operations. This monitoring condition ensures compliance with this limit through semi-annual Method 9 or Method 22 opacity tests per the frequency under 40 CFR 63.10898(h)&(i) and the requirements under Table 1 to 40 CFR, Subpart ZZZZZ and 40 CFR 63.6(h). This monitoring condition replaces the condition for this regulatory citation from the prior permit which required daily visible emissions monitoring and was not consistent with the requirements of 40 CFR 63, Subpart ZZZZZ. The prior monitoring condition for this regulatory citation has been removed because the monitoring requirements overlapped with other conditions in this permit and additional monitoring beyond that specified by the rule is not considered necessary.
- **Condition 42** – 40 CFR 63.10895(b) - Requires that melting furnaces at affected iron and steel foundries use a capture and collection system. This monitoring condition ensures compliance through designing capture and collection systems to meet accepted engineering standards.

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- **Condition 42** – 40 CFR 63.10896(a) – Requires operation of control devices for affected sources to be operated in accordance with a written operations and maintenance plan. This monitoring condition ensures compliance with these limits through work practice and recordkeeping requirements.
- **Condition 44** – 40 CFR 63.10897(a)(1) – Requires an initial and periodic inspections of PM control devices for melting furnaces at affected iron and steel foundries to ensure proper device operation. Monitoring frequency for periodic inspections is monthly and semi-annually for exterior and interior inspections, respectively. Compliance with this requirement is demonstrated through monitoring and recordkeeping per the methods and frequency requirements under the provisions of 40 CFR 63, Subpart ZZZZZ.
- **Condition 45** – 40 CFR 63.10897(d) – Requires installation, operation, and maintenance of a certified, bag-leak detection device on baghouses at affected iron and steel foundries to ensure proper device operation. This monitoring condition ensures compliance through a written operations and maintenance plan, monthly inspections, and recordkeeping requirements.
- **Conditions 46, 47, 50** - 6 NYCRR 216.3 – This monitoring condition ensures proper operation of control devices through continuous monitoring of the pressure drop range across the device.
- **Conditions 48, 51** - 6 NYCRR 216.3 – Limits PM emissions from subject emission points. To comply with this limit, this monitoring condition requires a Method 5 emissions test once per permit term for each affected emission point. For new control devices, the initial test must be completed within one year of permit issuance. The frequency of periodic testing is justified since the emission sources/points utilize PM control devices and are therefore not anticipated to exceed the applicable limit.
- **Condition 49** - 40 CFR 63.10895(c)(1) – Limits emissions of particulates from metal melting furnaces at existing iron and steel foundries to 0.8 pounds of particulate per ton metal charged. This monitoring condition ensures compliance with these limits through periodic testing and reevaluation of the metal melting furnace particulate emission rate per 40 CFR 63.10898(a), (d), (e), and (f). The applicable intermittent emissions testing requirement under 40 CFR 63.10898(a) is satisfied through meeting the testing requirements of 6 NYCRR 216.3 required elsewhere in this permit. The emission rate calculated per the methods of 40 CFR 63.10898(d), (e), and (f) must be based on the results of the most recent stack test completed under 6 NYCRR 216.3. The frequency of monitoring is consistent with the requirements under 40 CFR 63.10898(b).
- **Condition 52** – 40 CFR 63.10886 – Prohibits the use of methanol in the catalyst formulation for furfuryl alcohol warm box mold or core making lines at the facility. This monitoring condition ensures compliance with this prohibition through recordkeeping.
- **Condition 53** - 6 NYCRR 228-1.1(a)(3) – Specifies that a facility/emissions process subject to the requirements of 6 NYCRR Subpart 228-1 remain subject to this Subpart if the facility/emissions process no longer meets the applicability criteria.
- **Condition 54** - 6 NYCRR 228-1.3(a) – This condition specifies the monitoring and recordkeeping to ensure compliance with the 20 percent opacity emissions limit. The daily monitoring frequency is justified because the rule does not specify a monitoring frequency and visible emissions from subject sources are not expected to cause exceedances. Properly operated spray coating operations that use these materials are unlikely to produce visible emissions.
- **Condition 55** - 6 NYCRR 228-1.3(b)(1) – This condition specifies the recordkeeping procedures for affected surface coating operations. This monitoring condition ensures compliance the requirements of 6 NYCRR Subpart 228-1 as required elsewhere in this permit.
- **Condition 56** - 6 NYCRR 228-1.3(d) – This condition specifies storage, handling, and disposal requirements for VOCs. This monitoring condition minimizes fugitive emissions of VOCs.
- **Condition 57** - 6 NYCRR 228-1.4(b)(4)(ii) – Requires that “extreme performance coatings” used in surface coating operations contain, as applied, minus water and excluded compounds, no more than

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3.5 pounds of VOCs per gallon. This monitoring condition ensures compliance with these limits through recordkeeping and/or analysis.

- **Condition 58** – 6 NYCRR 228-1.6(a) – Specifies that testing of surface coatings subject to 6 NYCRR Subpart 228-1 may be performed upon the request of the Department. This monitoring condition ensures compliance with VOC content limits through intermittent emissions testing.
- **Condition 60** – 40 CFR 63.3890(b)(1) – Limits organic HAP emissions to 0.31 kg per liter of coating solids on a 12-month rolling-basis. The facility demonstrates compliance with this condition by meeting the requirements of the *Emission rate without add-on controls option* under 40 CFR 63.3890(b)(1) that are described in Condition 60 of this permit.
- **Condition 61** – 40 CFR 63.3890(b)(1) – This condition specifies the monitoring and recordkeeping to ensure compliance with the organic HAP emissions limit under 40 CFR 63, Subpart MMMM. This monitoring condition ensures compliance with this limit through a monthly determination of the organic HAP emission rate from surface coating processes which is incorporated into a 12-month rolling total. The monitoring methods and frequency are consistent with the requirements under the provisions of 40 CFR 63, Subpart MMMM.
- **Condition 63** – 40 CFR 63.3910(c) – An initial Notification of Compliance Status report is required under the provisions of 40 CFR 63, Subpart MMMM.
- **Condition 64** – 40 CFR 63.3920(a)– Semi-annual compliance reports are required under the provisions of 40 CFR 63, Subpart MMMM.
- **Condition 65** – 40 CFR 63.3930 – This condition specifies the recordkeeping procedures for affected coating processes. This monitoring condition ensures compliance with the requirements of 40 CFR 63, Subpart MMMM as required elsewhere in this permit.
- **Condition 66** – 40 CFR 63.3931 – This condition specifies the acceptable recordkeeping duration and formats required under the provisions of 40 CFR 63, Subpart MMMM.
- **Condition 67** – 40 CFR 63.3950 – Requires an initial compliance demonstration with the organic HAP emissions limit under 40 CFR 63, Subpart MMMM. This monitoring condition ensures compliance with this limit through determining the organic HAP emission rate from surface coating processes during the initial 12-month compliance period. The monitoring methods are consistent with the requirements under the provisions of 40 CFR 63, Subpart MMMM.
- **Condition 68** – 40 CFR 63.11516(f) – This condition specifies the management practices or fume control measures applicable to welding operations that use metal fabrication HAPs (MFHAPs). Applicability is determined through monthly monitoring of annual welding rod usage per the requirements under 40 CFR 63, Subpart XXXXXX. The facility demonstrates compliance by meeting the recordkeeping requirements specified elsewhere in this permit.
- **Condition 69** – 40 CFR 63.11519(a) – An initial Notification of Compliance Status report is required under the provisions of 40 CFR 63, Subpart XXXXXX.
- **Condition 70** – 40 CFR 63.11519(b) – Semi-annual compliance reports are required under the provisions of 40 CFR 63, Subpart XXXXXX.
- **Condition 71** – 40 CFR 63.11519(b) – This condition specifies the recordkeeping procedures for affected metal fabrication and finishing source categories. This monitoring condition ensures compliance with the requirements of 40 CFR 63, Subpart MMMM as required elsewhere in this permit.
- **Condition 75** – 6 NYCRR 212-2.3(b) – Requires recordkeeping of the listed air contaminant’s emission rate potentials (ERPs) to demonstrate compliance with the applicable Short-term and Annual Guideline Concentrations under Part 6 NYCRR Part 212 and DAR-1. This monitoring method and frequency are justified because the rule does not specify a monitoring method, the condition requires reevaluation of ambient impacts if an increase in ERP is observed, and the air contaminants have been

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assigned an Environmental Rating of “B”. Additionally, an increase to ERP is expected to occur only as a result of equipment additions or changes to the process that must first be approved through operational flexibility or permit modification.

- **Condition 76** – 6 NYCRR 212-2.3(b) - Requires monitoring of the wet scrubber to demonstrate compliance with the air cleaning requirements of 6 NYCRR Part 212. This monitoring condition ensures proper operation of the wet scrubber by limiting the scrubbing liquid pH to a maximum of 5 and daily pH monitoring. This monitoring frequency is justified because the rule does not specify a frequency and daily monitoring is expected to capture changes to pH prior to exceedance of the limit.
- **Condition 77** – 6 NYCRR 212-2.4(b) – Limits emissions of particulates to 0.050 grains per dry standard cubic foot of exhaust from processes emission sources. Compliance with this requirement is demonstrated through observation of the process and investigation of malfunctions, visible emissions, and other causes that may generate particulate emissions in exceedance of the limit. This monitoring method is justified because the process is equipped with a filter for particulate control and is not anticipated to exceed the particulate emission limit during normal operation.