

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility Permit ID: 4-0118-00001/02003

Mod 0 Effective Date: 09/28/2020 Expiration Date: 09/27/2030

Mod 1 Effective Date: 04/22/2022 Expiration Date: 09/27/2030

Mod 2 Effective Date: 08/24/2022 Expiration Date: 09/27/2030

Permit Issued To:US DEPT OF THE ARMY

THE PENTAGON

WASHINGTON, DC 20310

Contact: ERIC MARCY

US ARMY WATERVLIET ARSENAL

1 BUFFINGTON ST WATERVLIET, NY 12189

(518) 266-4268

Facility: U S ARMY WATERVLIET ARSENAL

BROADWAY

WATERVLIET, NY 12189-4000

Contact: ERIC MARCY

US ARMY WATERVLIET ARSENAL

1 BUFFINGTON ST WATERVLIET, NY 12189

(518) 266-4268

Description:

The U.S. Army Watervliet Arsenal (WVA) facility is currently permitted under the New York State Department of Environmental Conservation (NYSDEC) Air State Facility (ASF) permit #4-0118-00001/02003. WVA is preparing to replace the existing Selas natural gas-fired furnace (Emission Point: EP105) with a new furnace.

The new Gun Tube Furnace will be used to heat treat cannon barrels and serve as a direct replacement for the existing 41.6 MMBtu/hr Selas Furnace. The new Gun Tube furnace will consist of three separate stages (austenitizing, quench and temper), each having its own individually operated furnace equipped. Natural Gas will serve as the primary fuel for each individual furnace and Synthetic Natural Gas (SNG) generated from Liquefied Petroleum Gas (LPG) and air will serve as an emergency backup fuel. This replacement does not cause the facility's emissions to exceed a limitation or other condition in the permit, cause the facility to become subject to additional

Division of Air Resources



Facility DEC ID: 4011800001

regulations or requirements, nor does it establish or modify a federally-enforceable emissions cap or limit.

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

Permit Administrator: PATRICIA M GABRIEL

NYSDEC - REGION 4 1130 N WESTCOTT RD

SCHENECTADY, NY 12306-2014

Authorized Signature:			
Date:	1		



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



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- 6 5 Permit modifications, suspensions or revocations by the Department Facility Level
- Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS



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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

Condition 1-1: Applications for permit renewals, modifications and transfers Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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

Item1-1.2:

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

Item 1-1.3

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

Condition 3: Applications for permit renewals, modifications and transfers



Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item3.2:

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

Item 3.3

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

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

Item 4.1:

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

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

**** Facility Level ****

Condition 5: Submission of application for permit modification or renewal-REGION 4
HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator Region 4 Headquarters Division of Environmental Permits 1130 North Westcott Rd. Schenectady, NY 12306-2014 (518) 357-2069



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:US DEPT OF THE ARMY THE PENTAGON WASHINGTON, DC 20310

Facility: U S ARMY WATERVLIET ARSENAL

BROADWAY

WATERVLIET, NY 12189-4000

Authorized Activity By Standard Industrial Classification Code:

9711 - NATIONAL SECURITY

Mod 0 Permit Effective Date: 09/28/2020 Permit Expiration Date: 09/27/2030

Mod 1 Permit Effective Date: 04/22/2022 Permit Expiration Date: 09/27/2030

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NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



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

- (a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.
- (b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

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

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

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

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

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

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

The owner and/or operator of an emission source or unit



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

Item I: Required Emission Tests - 6 NYCRR 202-1.1

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS The following conditions are federally enforceable.

Condition 1: Recycling and Emissions Reduction

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 1.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

Condition 2: Exempt and Trivial Activities Applicability

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 201-3.1 (a)

Item 2.1:

If the facility owner and/or operator performs any of the exempt and trivial activities listed in 6 NYCRR Part 201-3.2(c) or 201-3.3(c), such activities are exempt from the permitting provisions of 6 NYCRR Part 201-5, but not from other Parts of 6 NYCRR Chapter III, or from applicable permitting requirements of local air pollution control agencies.

Condition 1-1: Facility Permissible Emissions Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 2-1.1:

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

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

CAS No: 000630-08-0	(From Mod 2)	PTE:	180,000	pounds

per year

Name: CARBON MONOXIDE

CAS No: 0NY210-00-0 (From Mod 2) PTE: 180,000 pounds

per year

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0 (From Mod 2) PTE: 96,000 pounds

per year

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Name: VOC

Condition 2-1: Capping Monitoring Condition

Effective between the dates of 08/24/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 2-1.1:

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

6 NYCRR Subpart 201-6

Item 2-1.2:

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

Item 2-1.3:

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

Item 2-1.4:

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

Item 2-1.5:

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

Item 2-1.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 2-1.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

OPERATIONS

Monitoring Description:

Emission of carbon monoxide (CO) shall not exceed 90 tons

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during any 12-month rolling period to preclude Title V. The facility shall monitor the quantity of each fuel used and calculate CO emission on a monthly basis. Fuel usage and CO emission will be recorded monthly and reported annually.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: FUEL

Upper Permit Limit: 90 tons per year Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 2-2: Capping Monitoring Condition Effective between the dates of 08/24/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 2-2.1:

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

6 NYCRR Subpart 201-6

Item 2-2.2:

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

Item 2-2.3:

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

Item 2-2.4:

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

Item 2-2.5:

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



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Item 2-2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 2-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Emission of oxides of nitrogen (NOx) shall not exceed 90 tons during any 12-month rolling period to preclude Title

The facility shall monitor the quantity of each fuel used and calculate NOx emission on a monthly basis. Fuel usage and NOx emission will be recorded monthly and reported annually.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: FUEL

Upper Permit Limit: 90 tons per year Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 1-2: Capping Monitoring Condition Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 1-2.1:

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

6 NYCRR Subpart 201-6

Item 1-2.2:

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

Item 1-2.3:

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



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other state and federal air pollution control requirements, regulations or law.

Item 1-2.4:

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

Item 1-2.5:

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

Item 1-2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 1-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

OPERATIONS

Monitoring Description:

Emission of oxides of nitrogen (NOx) shall not exceed 90 tons during any 12-month rolling period to preclude Title

The facility shall monitor the quantity of each fuel (No.2 fuel oil, natural gas, and diesel fuel) used and calculate

NOx

emission on a monthly basis. Fuel usage and NOx emission will be recorded monthly and reported annually.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: FUEL

Upper Permit Limit: 90 tons per year Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 2-3: Capping Monitoring Condition Effective between the dates of 08/24/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 2-3.1:

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

6 NYCRR Subpart 201-6

Item 2-3.2:

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

Item 2-3.3:

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

Item 2-3.4:

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

Item 2-3.5:

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

Item 2-3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission of volatile organic compounds (VOC) shall not

exceed 48 tons

during any 12-month rolling period to preclude Title V.

The facility

shall monitor the quantity of each fuel, coating,

solvent,

and VOC-containing material used/processed and calculate

VOC emission

on a monthly basis. Fuel, coating, solvent,

and material usage/throughput and VOC emission will be

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recorded monthly and reported annually.

Monitoring Frequency: MONTHLY Reporting Requirements: ANNUALLY (CALENDAR) Reports due 30 days after the reporting period. The initial report is due 1/30/2023. Subsequent reports are due every 12 calendar month(s).

Condition 1-3: Capping Monitoring Condition Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 1-3.1:

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

6 NYCRR Subpart 201-6

Item 1-3.2:

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

Item 1-3.3:

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

Item 1-3.4:

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

Item 1-3.5:

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

Item 1-3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-3.7:

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Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Emission of volatile organic compounds (VOC) shall not exceed 48 tons during any 12-month rolling period to preclude Title V. The facility shall monitor the quantity of each fuel (No.2 fuel oil, natural gas, and diesel fuel), coating, solvent, and VOC-containing material used/processed and calculate VOC emission on a monthly basis. Fuel, coating, solvent,

and material usage/throughput and VOC emission will be recorded monthly and reported annually.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 1-4: Capping Monitoring Condition Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 1-4.1:

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

6 NYCRR Subpart 201-6

Item 1-4.2:

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

Item 1-4.3:

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

Item 1-4.4:

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



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applicable requirement.

Item 1-4.5:

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

Item 1-4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 1-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

OPERATIONS

Monitoring Description:

Emission of carbon monoxide (CO) shall not exceed 90 tons

during any 12-month rolling period to

preclude Title V. The facility shall monitor the quantity

of each fuel (No.2 fuel oil, natural gas, and

diesel fuel) used and calculate CO emission on a monthly

basis. Fuel usage and CO emission will be recorded monthly and reported annually.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: FUEL

Upper Permit Limit: 90 tons per year Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 3: Visible Emissions Limited

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 211.2

Item 3.1:

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

Condition 1-5: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

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

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Item 1-5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall 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. If visible emissions are observed to be out of the normal operating range, the facility will investigate, determine the cause, make the necessary corrections, and verify that visible emissions have returned to the normal operating range. If visible emissions continue to be outside the normal operating range after making corrections, the facility will perform a Method 9 opacity evaluation within 24 hours to determine the opacity and take corrective actions, if necessary. Records of these observations, investigations, and corrective actions will be kept on-site. The department also reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Reference Test Method: EPA RM 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-6: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)

Item 1-6.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

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Monitoring Description:

Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: USEPA Reference Test Method 5

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-7: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 228-1.3 (e) (2)

Item 1-7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

A facility containing a coating line (other than a class A coating line) may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4; provided such use is recorded on an as used basis and maintained at the facility for a period of five years.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 55 gallons per year Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2022.

Subsequent reports are due every 6 calendar month(s).

Condition 1-8: Surface coating access for sampling

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Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 228-1.6 (c)

Item 1-8.1:

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

Condition 1-9: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 228-1.6 (h)

Item 1-9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-10: Enforceability Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60.42c(i), NSPS Subpart Dc

Item 1-10.1:

The sulfur dioxide emission limits, percentage reductions, and fuel oil sulfur limitations shall apply at all times, including periods of startup, shutdown, and malfunction.

Condition 1-11: Emissions monitoring Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement:40CFR 60.47c(c), NSPS Subpart Dc

Item 1-11.1:

Affected facilities that burn only distillate oil that contains no more than 0.5 weight percent sulfur and/or liquid or gaseous fuels with potential sulfur dioxide emission rates of 26 ng/J (0.06 lb/MMBtu) heat input or less and that do not use a post-combustion technology to reduce SO2or PM emissions are not required to operate a CEMS for measuring opacity if they follow the applicable procedures under 40 CFR 60.48c(f).



Condition 1-12: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60.48c(a), NSPS Subpart Dc

Item 1-12.1:

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

Emission Unit: 1-COMBU

Item 1-12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner and operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7 of this part. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

Monitoring Frequency: SINGLE OCCURRENCE Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-13: General Provisions Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 63, Subpart A

Item 1-13.1:

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 4: Halon Emissions Reduction
Effective between the dates of 09/28/2020 and 09/27/2030



Applicable Federal Requirement: 40CFR 82, Subpart H

Item 4.1:

The permittee shall comply with the standards for halon emissions reduction pursuant to 40CFR Part 82, Subpart H.

**** Emission Unit Level ****

Condition 1-14: Applicability of General Provisions of 40 CFR 60 Subpart A Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60, NSPS Subpart A

Item 1-14.1:

This Condition applies to Emission Unit: 1-COMBU

Item 1-14.2:

This emission source is subject to the applicable General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

Condition 1-15: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60.42c(d), NSPS Subpart Dc

Item 1-15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Item 1-15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

On or after the date on which the initial performance

test is

completed or required to be completed under section 60.8

of this part,

no owner or operator of an affected facility that combusts

oil shall

combust oil with a sulfur content in excess of 0.5 percent by weight.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FUEL OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.50 percent alcohol by weight

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Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -

SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2022.

Subsequent reports are due every 6 calendar month(s).

Condition 1-16: Enforceability

Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60.42c(i), NSPS Subpart Dc

Item 1-16.1:

This Condition applies to Emission Unit: 1-COMBU

Item 1-16.2:

The sulfur dioxide emission limits, percentage reductions, and fuel oil sulfur limitations shall apply at all times, including periods of startup, shutdown, and malfunction.

Condition 1-17: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60.48c(f)(1), NSPS Subpart Dc

Item 1-17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Compliance with emission limits and/or fuel oil sulfur limitations shall be based on a certification from the fuel supplier as stated in paragraph 40 CFR 60-Dc.48c(f)(1). Fuel supplier certification shall include the following information for distillate oil:i) The name of the oil supplier, andii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41 c. 60-Dc 41 c defines distillate oil as fuel that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, A standard Specification for Fuel Oils.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-18: Compliance Demonstration

Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement:40CFR 60.48c(g), NSPS Subpart Dc

Item 1-18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility combusts only natural gas or distillate oil using fuel certification in §60.48c(f) to demonstrate compliance with the S02 standard, and will record and maintain records of the amount of each fuel combusted during each calendar month.

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-19: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60.48c(i), NSPS Subpart Dc

Item 1-19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Item 1-19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record, for determining compliance with the NSPS requirements.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-20: Compliance Demonstration

Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60.48c(j), NSPS Subpart Dc

Item 1-20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Item 1-20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2022.

Subsequent reports are due every 6 calendar month(s).

Condition 1-21: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)

Item 1-21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Process: CBO

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

Item 1-21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

No owner or operator of an existing stationary combustion installation which fires oil shall be allowed to emit

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particulate matter (PM) in excess of 0.10 pound per million Btu heat input. This limit applies to Boilers #3 (EP95C), #4 (EP95D). The boilers are in compliance with the PM limit based on the AP-42 emission factor used to estimate the PM emission.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-22: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 227-1.3 (c)

Item 1-22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Process: CBO

Item 1-22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility shall perform an annual tune-up for Boilers #3 (EP95C), #4 (EP95D). Records of each annual tune-up must be maintained on site or at an alternative location, as approved by the department, for a minimum of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-23: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 227-1.4 (a)

Item 1-23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Process: CBO

Item 1-23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

No person shall orcerate a stationary combustion

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installation which exhibits greater than 20 percent opacity (six minute average), except or one-six-minute period per hour of not more than 27 percent opacity. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation. The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard. The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem em has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met. Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that at permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Reference Test Method: Method 9 Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-24: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.11225(a), Subpart JJJJJJ

Item 1-24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Process: CBO Emission Source: BL95D

Item 1-24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Must submit Initial Notification no later than January

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20, 2014 or

within 120 days after the source becomes subject to the standard.Must

submit the Notification of Compliance Status no later than 120 days

after the applicable compliance date specified in § 63.11196 in

accordance with paragraphs (a)(4)(i) and (vi) of this section. The

Notification of Compliance Status must include the information and

certification(s) of compliance in paragraphs (a)(4)(i) through (v) of

this section, as applicable, and signed by a responsible official. The

notification must be submitted electronically using the Compliance and

Emissions Data Reporting Interface (CEDRI) that is accessed through

EPA's Central Data Exchange (CDX). However, if the reporting form

specific to this subpart is not available in CEDRI at the time that

the report is due, the written Notification of Compliance Status must

be submitted to the Administrator at the appropriate address listed in \$63.13

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-25: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.11225(b), Subpart JJJJJJ

Item 1-25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Process: CBO Emission Source: BL95D

Item 1-25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

For boilers that are subject only to the energy assessment requirement and/or a requirement to conduct a 5-year tune-up according to § 63.11223(a) and not subject to emission limits or operating limits, prepare a 5-year

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compliance report as specified in paragraphs (b)(1) and (2) of this section, and submit to the delegated authority upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-26: Compliance Demonstration

Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.11225(c), Subpart JJJJJJ

Item 1-26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU

Process: CBO Emission Source: BL95D

Item 1-26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Facility must keep the following records: (1) Copies of any notifications and reports that are submitted to comply with the subpart and all documentation supporting any Initial Notification of Notification of Compliance Status submitted.(2) Records that document conformance with the work practices, emission reduction measures and management practices required by § 63.11214 and § 63.11223 that includes tune-up dates of the boiler, procedures followed for tune-up and manufacturer's specifications to which the boiler was tuned, energy assessment report, records of operating days per year, occurrence/duration of each malfunction of the boiler or of the associated air pollution control & monitoring equipment, actions taken during periods of malfunction to minimize emissions and corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation .Records must be in a form suitable and readily available for expeditious review. The facility must keep each record for 5 years following the date of each recorded action. The facility must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The facility may keep the records off site for the remaining 3 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 1-27: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.11201(b), Subpart JJJJJJ

Item 1-27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COMBU Emission Point: EP95D Process: CBO Emission Source: BL95D

Item 1-27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement. For existing seasonal boilers, conduct an initial tune-up as specified in § 63.11214, and conduct a tune-up of the boiler every 5 years as specified in § 63.11223.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-28: Applicability of General Provisions of 40 CFR 60 Subpart A Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60, NSPS Subpart A

Item 1-28.1:

This Condition applies to Emission Unit: 2-WWTRE

Item 1-28.2:

This emission source is subject to the applicable General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

Condition 1-29: Compliance Demonstration

Effective between the dates of 04/22/2022 and 09/27/2030



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

Item 1-29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-WWTRE

Process: CR1

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Process emission of sulfur dioxide (SO2) from the chromic acid waste treatment process shall be limited such that the facility-wide impact from all process (non-combustion) emission sources of SO2 is less than the Ambient Air Quality Standards (NAAQS and State AAQS). The facility-wide impact will be determined using air dispersion modeling (AERMOD) conducted in accordance with the approved air dispersion modeling protocol and Policy DAR-10: NYSDEC Guidelines on Dispersion Modeling Procedures for Air Quality Impact Analysis. Reaction Tanks #1 and #2 (Emission Points 0026A and 0026B) for the chromic acid waste treatment process (CR1) are subject to compliance monitoring to ensure the facility-wide impact from process emission sources of SO2 does not exceed the Ambient Air Quality Standards. The facility will comply with the requirement by monitoring the emissions of SO2 and waste throughput (gallons) for the reaction tanks on a monthly basis. On a monthly basis, the facility will calculate the previous month's emissions and the 12-month rolling emissions. The emissions are calculated using the following formulas:-Monthly Emission (lbs/month)= Reaction tanks waste

12-month Rolling Emissions (lbs/12-month) = Monthly Emission (lbs/month)+ Previous 11-month Emissions (lbs/11-months)

throughput (gallons/month) x SO2 emission factor (lb/gal)

SO2 emission factor is currently estimated at 0.000374 lb/gal based on the average results for residual sulfite in the treated waste samples collected during the Dec 2018 pilot testing. The facility is allowed to increase or decrease the emission factor for the process as long as the annual emission of SO2 from the process remains at or below the SO2 emission cap.



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Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: WASTEWATER

Upper Permit Limit: 14324 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 1-30: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 228-1.6 (a)

Item 1-30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-MANUF

Item 1-30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-31: Applicability of General Provisions of 40 CFR 60 Subpart A Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60, NSPS Subpart A

Item 1-31.1:

This Condition applies to Emission Unit: 3-MANUF

Item 1-31.2:

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

This emission source is subject to the applicable General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

Condition 1-32: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 228-1.3 (a)

Item 1-32.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-MANUF

Process: PNT

Item 1-32.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during and six consecutive minutes of 20% or greater from any process emissions source, except only the emission of uncombined water. Compliance with this requirement shall be determined by the facility conducting a daily survey of visible emissions only when the process is in operation. If any visible emissions are identified, corrective action is required. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-33: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b)

Item 1-33.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-MANUF

Process: PNT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

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Item 1-33.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

- (1) Maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department within 90 days of receiving the request. Maintain records that identifies an overall removal efficiency of at least 90 percent for the air cleaning device. Maintain records for a period of five years.
- (2) for non compliant coatings required to meet the 55 gal facility-wide limit, maintain usage records. Maintain records for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-34: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 1-34.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-MANUF

Process: PNT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-34.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Facility shall comply with the handling, storage and disposal requirements:

(1) use closed, non leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

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- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: pray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
 (i) an enclosed spray gun cleaning system that is kept
 closed wen not in use;; (ii) non-atomized discharge of VOC
 solvent into a paint waste container that is kept closed
 when not in use; (iii) disassembling and cleaning of the
 spray gun in a vat that is kept closed when not in use; or
 (iv) atomized spray into a paint waste container that is
 fitted with a device designed to capture atomized VOC
 solvent emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-35: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 228-1.4 (b) (4)

Item 1-35.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-MANUF

Process: PNT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-35.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

OPERATIONS

Monitoring Description:

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

A facility applying miscellaneous metal parts coatings must use application techniques is specified in section 228-1.3(e)(3) of this subpart.

A facility applying miscellaneous metal parts coatings may not use coatings with VOC contents, as applied, which exceed the limits specified in table B4. The facility must specify the use of baked or air dried for the purpose of compliance and record keeping. All units in table B4 are in terms of weight (kg or lbs) of VOC per volume (liters or gallons) of coating (minus water and excluded compounds) at application. Facility will comply with this requirement by maintaining records as specified in 228-1.3(b)

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT Upper Permit Limit: 6.2 pounds per gallon

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Required emission tests

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 202-1.1

Item 5.1:

This Condition applies to Emission Unit: U-ELPLT

Item 5.2:

An acceptable report of measured emissions shall be submitted, if requested by the commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation.

Condition 1-46: Compliance Demonstration

Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 212-1.5 (e) (2)

Item 1-46.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Item 1-46.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

Monitoring Description:

A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 61 or Part 63 (see Table 1 of Section 200.9 of this Title) satisfies the requirements of this Part for the respective air contaminant regulated by the Federal standard if the facility owner or operator can demonstrate that the process emission source is in compliance with the relevant Federal regulation.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-36: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 1-36.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-36.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Facility shall comply with the handling, storage and disposal requirements:

(1) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC

solvents that are used for surface preparation, cleanup or coating removal;

(2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or

coating removal;

(3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and

to minimize VOC evaporation;

(4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance

or inspection procedures require operational access. This provision does not apply to the actual device or equipment

designed for the purpose of applying a coating material to a substrate. These devices may include, but are not



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limited

to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
- (i) an enclosed spray gun cleaning system that is kept closed

when not in use; (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in

use; (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or (iv) atomized spray

into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-37: Applicability of General Provisions of 40 CFR 60 Subpart A Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 60, NSPS Subpart A

Item 1-37.1:

This Condition applies to Emission Unit: U-ELPLT

Item 1-37.2:

This emission source is subject to the applicable General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

Condition 1-38: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement:40CFR 63.342(c)(1)(i), Subpart N

Item 1-38.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-38.2:

Compliance Demonstration shall include the following monitoring:

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

For the existing scrubbers at Emission Points 00130, 00155, and 0024A, the concentration of total chromium in

the

scrubber exhaust shall not exceed 0.011 mg/dscm (per

reference method 306/306A).

Parameter Monitored: CHROMIUM

Upper Permit Limit: 0.011 milligrams per dry standard

cubic meter

Reference Test Method: Method 306/306A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-39: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement:40CFR 63.342(c)(1)(iv), Subpart N

Item 1-39.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-39.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Following the replacement of the scrubber at Emission Point 00130, the concentration of total chromium in the scrubber

scrubber

exhaust shall not exceed 0.006 mg/dscm (per reference method 306/306A). Initial performance testing to

demonstrate

compliance with the total chromium limit shall be conducted upon startup. The facility shall notify the

Administrator at

least 60 calendar days before the test. The test report shall be submitted to the administrator no later than 90 calendar days following the completion of the performance test.

Parameter Monitored: CHROMIUM

Upper Permit Limit: 0.006 milligrams per dry standard cubic meter

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

Reference Test Method: Method 306/306A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-40: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.342(f), Subpart N

Item 1-40.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-40.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility shall comply with the operations and maintenance practices, and prepare operations and maintenance plans according to 40 CFR Part 63.342(f) for the chromium electroplating process at Emission Points 00130, 00155, and 0024A.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-41: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement:40CFR 63.343(c)(1), Subpart N

Item 1-41.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-41.2:

Compliance Demonstration shall include the following monitoring:

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Facility shall monitor the pressure drop across the respective scrubber each day the chromium electroplating processes

at Emission Points 00130, 00155, and 0024A operate. The pressure drop value shall be established during the initial

performance test and the scrubber shall be operated within +/- 2 inches of water column of the established pressure

drop value.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-42: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.345(b), Subpart N

Item 1-42.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-42.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

For the chromium electroplating process at Emission Points 00130, 00155, and 0024A, notification of construction or

reconstruction shall be submitted to the Administrator as soon as practicable before the construction is planned to

commence.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-43: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.346, Subpart N

Item 1-43.1:

The Compliance Demonstration activity will be performed for:

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Emission Unit: U-ELPLT

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-43.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Maintain records required by the subpart and keep all records for a period of 5 years for the chromium

electroplating

process at Emission Points 00130, 00155, and 0024A.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-44: Compliance Demonstration

Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement:40CFR 63.347(e)(1), Subpart N

Item 1-44.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-44.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Following the replacement of the scrubber at Emission Point 00130, submit notification of compliance status to

the

Administrator no later than 90 calendar days following the

completion of compliance demonstration

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-45: Compliance Demonstration

Effective between the dates of 04/22/2022 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.347(h), Subpart N

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

Item 1-45.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-45.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For the chromium electroplating process at Emission Points 00130, 00155, and 0024A, prepare a summary report to

document the ongoing compliance status of the source. The report shall contain the information identified in 40 CFR

63.347(g)(3). The report shall be completed annually and retained on site, and be made available to the

Administrator

upon request.

Semiannual reports are required if any exceedances that meet the conditions provided in 40 CFR 63.347(h)(2) occur

at

the source.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Applicability of General Provisions of 40 CFR 60 Subpart A Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 40CFR 60, NSPS Subpart A

Item 6.1:

This Condition applies to Emission Unit: U-ELPLT

Process: PL1

Item 6.2:

This emission source is subject to the applicable general provisions of 40 CFR 60. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 7: Compliance Demonstration

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 6 NYCRR 212-1.5 (e) (2)

Item 7.1:

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT Emission Point: 00130

Regulated Contaminant(s):

CAS No: 018540-29-9 CHROMIUM(VI)

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility will comply with the annual emission caps by monitoring the emissions of chromium (VI) and operating amps (A-hr) on a monthly basis. On a monthly basis, the facility will calculate the previous month's emissions and add the emissions from the 11-months prior to previous month in order to estimate the 12-month rolling emissions. The emissions are calculated using the following formula:

monthly emissions (lbs/month) = Operating Amps (A-hr/month) X controlled emission factor (lb/A-hr)

12-month rolling emissions (lbs/12-month) = monthly emissions (lbs/Month) + previous 11-month emissions (lbs/11-months)

Controlled emission factor for chromium (VI) will be determined from stack testing.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 8: Compliance Demonstration

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.342(c)(1)(iv), Subpart N

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT Emission Point: 00130

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 8.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

Concentration of total chromium in the scrubber exhaust shall not exceed 0.006 mg/dscm (Per Reference method 306/306A). Initial performance testing to demonstrate compliance with the total chromium limit shall be conducted upon startup. The facility shall notify the administrator at least 60 calendar days before the test. The test report shall be submitted to the administrator no later than 90 calendar days following the completion of the performance test.

Upper Permit Limit: .006 milligrams per dry standard

cubic meter

Reference Test Method: Method 306/306A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 9: Compliance Demonstration

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.342(f), Subpart N

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT Emission Point: 00130

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Operations and maintenance practices, and prepare operations and maintenance plan according to 40 CFR part 63.342 (f)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Compliance Demonstration
Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement:40CFR 63.343(c)(1), Subpart N

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Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT Emission Point: 00130

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall monitor pressure drop across the scrubber on a daily basis. The pressure drop value shall be established during the initial performance test and the scrubber shall be operated within +/-2 inches of water column of the established pressure drop value.

Upon establishing pressure drop value, and including this permit into an existing permit, this condition will become a monitoring condition.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 11: Compliance Demonstration

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.345(b), Subpart N

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT Emission Point: 00130

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Notification of construction or reconstruction shall be submitted to the administrator as soon as practicable before the construction is planned to commence.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.346, Subpart N

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT Emission Point: 00130

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

maintains records required by the subpart and keep all

records for a period of 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 13: Compliance Demonstration

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement:40CFR 63.347(e)(1), Subpart N

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT Emission Point: 00130

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Submit notification of compliance status to the

administrator no later than 90 calendar days following the

completion of compliance demonstration.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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Condition 14: Compliance Demonstration
Effective between the dates of 09/28/2020 and 09/27/2030

Applicable Federal Requirement: 40CFR 63.347(h), Subpart N

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT Emission Point: 00130

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility is required to prepare a summary report to document the ongoing compliance status of the source. the report shall contain the information identified in 40 CFR 63.347(g)(3). The report shall be completed annually and retained on site, and be made available to the administrator upon request. Semiannual reports are required if any exceedances that meet the conditions provided in 40 CFR 63.347(h)(2) occur at the source.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS **** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

- (a) The affirmative defense of emergency shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
- (1) an emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) the equipment at the facility was being properly operated and maintained;
- (3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) the facility owner or operator notified the department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



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Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS The following conditions are state only enforceable.

Condition 15: Contaminant List

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable State Requirement: ECL 19-0301

Item 15.1:

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

CAS No: 000630-08-0

Name: CARBON MONOXIDE

CAS No: 007440-47-3 Name: CHROMIUM

CAS No: 007446-09-5 Name: SULFUR DIOXIDE

CAS No: 018540-29-9 Name: CHROMIUM(VI)

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CAS No: 0NY075-00-0 Name: PARTICULATES

CAS No: 0NY075-00-5

Name: PM-10

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

Name: VOC

Condition 16: Malfunctions and start-up/shutdown activities

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable State Requirement: 6 NYCRR 201-1.4

Item 16.1:

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.
- (c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.
- (d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements



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listed above must be adhered to in such circumstances.

Condition 1-47: Malfunctions and Start-up/Shutdown Activities Effective between the dates of 04/22/2022 and 09/27/2030

Applicable State Requirement: 6 NYCRR 201-1.4

Item 1-47.1:

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.
- (c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.
- (d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 17: Emission Unit Definition
Effective between the dates of 09/28/2020 and 09/27/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5



Item 17.1(From Mod 2):

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

Emission Unit: 1-COMBU **Emission Unit Description:**

> This emission unit consists of the non-exempt stationary combustion equipment firing natural gas, No. 2 fuel oil, and liquefied petroleum gas.

For this project, the existing 41.6 MMBtu/hr Selas furnace (emission source ID FN105, Emission point ID EP105) will be replaced with a new Gun Tube furnace, which will combust natural gas primarily and Synthetic Natural Gas (SNG) generated from liquefied Petroleum Gas (LPG)/ propane as the emergency backup fuel. The new Gun Tube furnace and its two new stacks will be installed adjacent to the existing selas furnace. The new Gun Tube furnace will heat treat cannon barrels in three stages austenitize, quench, and temper. The quench and temper stages are 2 MMBtu/hr and 6 MMBtu/hr, respectively, and are exempt sources pursuant to 201-3.2(c)(1)(i). The austenitizing furnace is 11.934 MMBtu/hr when firing natural gas and 11.77 MMBtu/hr (as propane). when firing SNG. The austenitizing furnace will resume the Emission Source ID FN105 and Emission Point ID EP105. The existing Selas furnace will be removed following the completion of the new furnace installation and startup.

Building(s): 135

Item 17.2(From Mod 1):

The facility is authorized to perform regulated processes under this permit for: **Emission Unit: 2-WWTRE**

Emission Unit Description:

This emission unit is for the facility's Industrial Wastewater Treatment Plant (IWTP). There are two treatment systems at the IWTP - chromic acid waste system and soluble oil or oily waste system. The chromic acid waste system is made up of one receiving well and two parallel treatment trains for chromium removal via chemical reduction, precipitation, and solids separation. Each treatment train consists of an acid waste storage tank, a reaction tank, a blend tank, and a clarifier. Treated wastewater from the chromic acid waste system discharges through a SPDES outfall. The oily waste system is a batch system consisting of an oily waste receiving well, two (2) batch tanks, one (1) skim oil holding tank, and one (1) oily sludge wet well. The treated supernatant from the soluble oil system is transferred to the chromic acid waste receiving well and goes through the chromic acid waste system prior to being discharge. Other than the treatment tanks, there are two (2) chemical mixing tanks (coagulant and flocculant), six (6) exempt chemical bulk storage and day storage tanks (sulfuric acid, caustic, and



sodium bisulfite), five (5) outdoor sludge drying beds, and one (1) exempt laboratory hood used for jar testing. The emission points and emission sources associated with this emission unit have been revised to note the sources that were removed, exempt/trivial sources that should be delisted from the permit, existing sources with revised emission point IDs, and existing sources that are not exempt/trivial and should be included in the permit. Removed: Emission Point EP192. Exempt/trivial to be delisted from permit: Emission Point IW196. Revised IDs: Emission Points IW199 revised to 00199, EP193 revised to 00193, IW194 revised to 00194, IW195 revised to 00195, IW197 revised to 00197, and IW198 revised to 00198. To be included in permit: Emission Points 00024, 00025, 0026A, and 0026B.

Item 17.3(From Mod 1):

The facility is authorized to perform regulated processes under this permit for: Emission Unit: 3-MANUF

Emission Unit Description:

This emission unit consists of the facility's manufacturing operations sources and processes that are necessary to complete the manufacture of cannons and associated parts.

The emission points and emission sources that were associated with Process ID STS were either exempt or removed.

Therefore, Process ID STS no longer exists and should be delisted from the permit.

The emission points and emission sources associated with this emission unit have been revised to note the sources that

were removed, exempt/trivial sources that should be delisted from the permit, existing sources with revised emission point

IDs, and existing sources that are not exempt/trivial and should be included in the permit.

Removed: Emission Point EP111, EP128, EP165, EP44A, EP177, and OP041.

Exempt/trivial to be delisted from permit: Emission Points EP015, EP075, EP076, EP077, EP209, EP210, EP176, OP038,

OP039, and OP040.

Building(s): 110

123 35 40-5

Item 17.4(From Mod 1):

The facility is authorized to perform regulated processes under this permit for: Emission Unit: U-ELPLT

Emission Unit Description:



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This emission unit is for the sources at Building 35 that were previously operated by WVA's contractor, Hartchrom, Inc. The sources include chromium electroplating operations that were regulated under Hartchrom's AFR certificate (registration ID 4-0118-00042/00001). WVA took over Hartchrom's operations on April 1, 2020. The operations that are still active at Building 35 consist of the following processes for the manufacture of cannon tubes: Majors Electroplating Line, Majors Backup Electroplating Line, Minors Electroplating Line 1, Minors Electroplating Line 3 (Manganese Conditioning and Phosphating), and Solid Film Coating and Curing.

Building(s): 35

Condition 18: Renewal deadlines for state facility permits
Effective between the dates of 09/28/2020 and 09/27/2030

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

Item 18.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 1-48: Renewal deadlines for state facility permits

Effective between the dates of 04/22/2022 and 09/27/2030

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

Item 1-48.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 19: Compliance Demonstration

Effective between the dates of 09/28/2020 and 09/27/2030

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

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

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

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Division of Air Resources NYS Dept. of Environmental Conservation Region 4 1130 N. Westcott Rd. Schenectady, NY 12306

Reporting Requirements: ANNUALLY (CALENDAR) Reports due 30 days after the reporting period. The initial report is due 1/30/2021. Subsequent reports are due every 12 calendar month(s).

Condition 1-49: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

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

Item 1-49.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-49.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

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

Division of Air Resources NYS Dept. of Environmental Conservation Region 4 1130 N. Westcott Rd. Schenectady, NY 12306

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 20: Air pollution prohibited

Effective between the dates of 09/28/2020 and 09/27/2030

Applicable State Requirement: 6 NYCRR 211.1

Item 20.1:

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

Condition 1-50: Compliance Demonstration

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Effective between the dates of 04/22/2022 and 09/27/2030

Applicable State Requirement: 6 NYCRR 211.1

Item 1-50.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-50.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

- 1. Have a complaint phone line available 24 hours a day, 7 days a week.
- 2. Investigate any possible causes of any complaint received.
- 3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
- 4. Fully document the complaint, results of investigation, and any action taken.
- 5. Report in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-51: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

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

Item 1-51.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 018540-29-9 CHROMIUM(VI)

Item 1-51.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Prior to constructing the replacement scrubber at Emission Point 00130 for the purpose of the facility meeting newly applicable requirements of 6 NYCRR Part 212, the facility will continue to operate the existing scrubber at this Emission Point under the current



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operating parameters established under the previous permit and the applicable standards/requirements associated with 40 CFR Part 63 Subpart N.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 21: Emission Point Definition By Emission Unit Effective between the dates of 09/28/2020 and 09/27/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 21.1(From Mod 2):

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

Emission Unit: 1-COMBU

Emission Point: EP105

Height (ft.): 68 Diameter (in.): 34 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: EP95C

Height (ft.): 85 Diameter (in.): 72 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: EP95E

Height (ft.): 90 Diameter (in.): 42 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: EP95G

Height (ft.): 159 Diameter (in.): 50 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: EP95D

Height (ft.): 85 Diameter (in.): 72 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Item 21.2(From Mod 1):

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

Emission Unit: 2-WWTRE

Emission Point: 00024

Height (ft.): 24 Diameter (in.): 8 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: 00025

Height (ft.): 24 Diameter (in.): 8

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NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: 00193

Height (ft.): 29 Diameter (in.): 4

NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: 00194

Height (ft.): 29 Diameter (in.): 12 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: 00195

Height (ft.): 29 Diameter (in.): 12 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: 00197

Height (ft.): 14 Diameter (in.): 4

NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: 00198

Height (ft.): 18 Diameter (in.): 4

NYTMN (km.): 4730.224 NYTME (km.): 606.033

Emission Point: 00199

Height (ft.): 22 Diameter (in.): 4

NYTMN (km.): 4730.224 NYTME (km.): 606.033

Emission Point: 0026A

Height (ft.): 32 Diameter (in.): 6

NYTMN (km.): 4730.224 NYTME (km.): 606.033

Emission Point: 0026B

Height (ft.): 35 Diameter (in.): 8

NYTMN (km.): 4730.224 NYTME (km.): 606.033

Item 21.3(From Mod 1):

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

Emission Unit: 3-MANUF

Emission Point: EP097

Height (ft.): 31 Diameter (in.): 42

NYTMN (km.): 4730.356 NYTME (km.): 605.769 Building: 123

Emission Point: EP127

Height (ft.): 48 Diameter (in.): 24

NYTMN (km.): 4730.356 NYTME (km.): 605.769 Building: 35

Emission Point: EP129

Height (ft.): 42 Diameter (in.): 24

NYTMN (km.): 4730.356 NYTME (km.): 605.769 Building: 35

Emission Point: EP167

Height (ft.): 48 Diameter (in.): 24

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NYTMN (km.): 4730.356 NYTME (km.): 605.769 Building: 40-5

Emission Point: EP185

Height (ft.): 57 Diameter (in.): 48

NYTMN (km.): 4730.356 NYTME (km.): 605.769 Building: 110

Emission Point: EP186

Height (ft.): 57 Diameter (in.): 48

NYTMN (km.): 4730.356 NYTME (km.): 605.769 Building: 110

Emission Point: EP202

Height (ft.): 30 Diameter (in.): 6

NYTMN (km.): 4730.356 NYTME (km.): 605.769 Building: 110

Emission Point: EP203

Height (ft.): 68 Diameter (in.): 6

NYTMN (km.): 4730.356 NYTME (km.): 605.769 Building: 110

Emission Point: EP204

Height (ft.): 25 Diameter (in.): 14

NYTMN (km.): 4730.356 NYTME (km.): 605.769 Building: 110

Item 21.4(From Mod 1):

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

Emission Unit: U-ELPLT

Emission Point: 00130

Height (ft.): 67 Diameter (in.): 48

NYTMN (km.): 4730.257 NYTME (km.): 605.765

Emission Point: 00153

Height (ft.): 73 Diameter (in.): 55

NYTMN (km.): 4730.224 NYTME (km.): 606.033

Emission Point: 00155

Height (ft.): 73 Diameter (in.): 48

NYTMN (km.): 4730.303 NYTME (km.): 605.877

Emission Point: 00156

Height (ft.): 73 Diameter (in.): 19

NYTMN (km.): 4730.301 NYTME (km.): 605.894

Emission Point: 00158

Height (ft.): 73 Diameter (in.): 55

NYTMN (km.): 4730.307 NYTME (km.): 605.884

Emission Point: 00159

Height (ft.): 73 Diameter (in.): 42

NYTMN (km.): 4730.224 NYTME (km.): 606.033

Emission Point: 00171

Height (ft.): 77 Diameter (in.): 30

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NYTMN (km.): 4730.224 NYTME (km.): 606.033

Emission Point: 0024A

Height (ft.): 66 Diameter (in.): 42 NYTMN (km.): 4730.252 NYTME (km.): 606.378

Emission Point: 0121A

Height (ft.): 61 Diameter (in.): 5 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Emission Point: 0171A

Height (ft.): 77 Diameter (in.): 30 NYTMN (km.): 4730.356 NYTME (km.): 605.769

Condition 22: Process Definition By Emission Unit Effective between the dates of 09/28/2020 and 09/27/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 22.1(From Mod 2):

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

Emission Unit: 1-COMBU

Process: CBG Source Classification Code: 3-03-015-80

Process Description:

This process includes the facility's non-exempt combustion sources fired with natural gas and includes Boiler #3, Boiler #5, Boiler #7, which are dual fired, and the Gun TUbe furnace (Selas Furnace replacement).

Emission Source/Control: BL95C - Combustion Design Capacity: 110 million Btu per hour

Emission Source/Control: BL95E - Combustion Design Capacity: 32 million Btu per hour

Emission Source/Control: BL95G - Combustion Design Capacity: 92 million Btu per hour

Emission Source/Control: FN105 - Combustion Design Capacity: 11.93 million Btu per hour

Item 22.2(From Mod 2):

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

Emission Unit: 1-COMBU

Process: SNG Source Classification Code: 1-02-010-02

Process Description:

This process is associated with the combustion of Synthetic Natural Gas (SNG) for the austenizing stage of the Gun Tube Furnace. SNG is generated from 40% by volume liquefied petroleum gas (LPG)/propane and 60% by volume air.



Emission Source/Control: FN105 - Combustion Design Capacity: 11.93 million Btu per hour

Item 22.3(From Mod 1):

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

Emission Unit: 1-COMBU

Process: CBO Source Classification Code: 3-03-015-80

Process Description:

This process includes the facility's non-exempt combustion souces fired with No. 2 Fuel Oil and includes Boiler #3, Boiler #4, and Boiler #5. The emission points/sources that have been removed or identified as exempt have been exclused, as noted in the emission unit description.

Emission Source/Control: BL95C - Combustion Design Capacity: 110 million Btu per hour

Emission Source/Control: BL95D - Combustion Design Capacity: 110 million Btu per hour

Emission Source/Control: BL95E - Combustion Design Capacity: 32 million Btu per hour

Item 22.4(From Mod 1):

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

Emission Unit: 2-WWTRE

Process: CR1 Source Classification Code: 5-01-007-01

Process Description:

This process is the chromic acid waste treatment system at the IWTP. The chromic acid waste system is made up of one receiving well and two parallel treatment trains for chromium removal via chemical reduction, precipitation, and solids separation. Each treatment train consists of an acid waste storage tank, a reaction tank, a blend tank, and a clarifier. Both treatment trains #1 and #2 use sodium bisulfite (NaHSO3) for chromium reduction. Settled sludge from the clarifiers is pumped to dedicated outdoor sludge drying beds. Liquid from the sludge drying beds is collected and pumped back to the chromic acid waste system and the dried sludge is hauled off site for disposal. Treated wastewater from the chromic acid waste system discharges through a SPDES outfall. Emissions from the process include VOCs from residual oil and grease (from the soluble oil or oily waste treatment system) in the receiving well and SO2 from excess sodium bisulfite dosing in Reaction Tanks #1 and #2. Other treatment chemicals (caustic, sulfuric acid, coagulant, and flocculant) used in the process are assumed to be consumed by the process and therefore, will have negligible emission.



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Emission Source/Control: IW026 - Control Control Type: CHEMICAL NEUTRALIZATION

Emission Source/Control: IW193 - Process

Design Capacity: 1,425 gallons

Emission Source/Control: IW194 - Process

Design Capacity: 48,000 gallons

Emission Source/Control: IW199 - Process

Design Capacity: 1,425 gallons

Emission Source/Control: IW26A - Process

Design Capacity: 2,675 gallons

Emission Source/Control: IW26B - Process

Design Capacity: 2,675 gallons

Item 22.5(From Mod 1):

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

Emission Unit: 2-WWTRE

Process: SOL Source Classification Code: 5-01-007-01

Process Description:

This process is the soluble oil or oily waste treatment system at the IWTP. The oily waste system is a batch system consisting of an oily waste receiving well, two (2) batch tanks, one (1) skim oil holding tank, and one (1) oily sludge wet well. Settled sludge from the oily sludge wet well is pumped to dedicated outdoor sludge drying beds. Liquid from the sludge drying beds is collected and pumped back to the oily waste system and the dried sludge is hauled off site for disposal. The skim oil is stored in the skim oil holding tank before it is hauled off site for disposal. The treated supernatant from the soluble oil system is transferred to the chromic acid waste receiving well and goes through the chromic acid waste system prior to being discharge. Emissions from the process include VOCs and HAPs from the receiving well, batch tanks, skim oil holding tank, and oily sludge wet well. Other treatment chemicals (caustic, sulfuric acid, coagulant, and flocculant) used in the process are assumed to be consumed by the process and therefore, will have negligible emission. The skim oil holding tank and sludge wet well tank are considered trivial sources pursuant to 201-3.3(c)(44).

Emission Source/Control: IW025 - Process

Emission Source/Control: IW195 - Process

Item 22.6(From Mod 1):

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

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

Emission Unit: 2-WWTRE

Process: TKS Source Classification Code: 5-01-007-01

Process Description:

This process is the chemical mixing tanks and exempt chemical storage tanks that serve the chromic acid waste treatment system and the soluble oil or oily waste treatment system at the IWTP. The exempt sulfuric acid bulk storage tank is an above ground storage tank located outside the building and the exempt caustic bulk storage tank is located in an underground vault outside the building. The two (2) chemical mixing tanks (coagulant and flocculant), exempt sodium bisulfite bulk storage tanks and day tank, and exempt sulfuric acid day tank are located inside the building. Emissions from the sulfuric acid bulk storage tank are associated with breathing and working losses (evaporation and tank filling). Emissions from the storage tanks and day tanks located inside the building are associated with working loss (tank filling) only. Emissions from the coagulant and flocculant mixing tanks are associated with minor particulate loss during manual addition of coagulant granules or flocculant granules into the mixing tank. Particulate emissions from the coagulant tank are controlled by a filter.

Emission Source/Control: IW197 - Process

Design Capacity: 500 gallons

Emission Source/Control: IW198 - Process

Design Capacity: 500 gallons

Item 22.7(From Mod 1):

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

Emission Unit: 3-MANUF

Process: FNS Source Classification Code: 3-01-014-50

Process Description:

This process is the facility's metal finishing

operations.

Emission Source/Control: 127EP - Process

Emission Source/Control: 129EP - Process

Emission Source/Control: 167EP - Process

Emission Source/Control: OP54A - Process

Item 22.8(From Mod 1):

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

Emission Unit: 3-MANUF

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Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

Process: INS Source Classification Code: 3-99-999-89

Process Description:

This process includes the curing ovens that had previously been identified as "insignificant" per

201-6.3(d)(7) which is an outdated requirement.

Emission Source/Control: 202EP - Process

Emission Source/Control: 203EP - Process

Emission Source/Control: 204EP - Process

Item 22.9(From Mod 1):

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

Emission Unit: 3-MANUF

Process: PNT Source Classification Code: 3-01-014-01

Process Description:

This process includes the facility's spray coating

booths. Metal parts are painted using a high-volume/low

pressure air

atomized spray gun. The walk-in spray booths use a dry

filter control system for particulates.

Emission Source/Control: 097EP - Process

Emission Source/Control: 185EP - Process

Emission Source/Control: 186EP - Process

Item 22.10(From Mod 1):

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

Emission Unit: U-ELPLT

Process: PL1 Source Classification Code: 3-09-010-06

Process Description:

This process is the 120 Electroplating (Majors) Line. There are two (2) identical plating lines, each performing a series of process steps and water rinses for the hard chromium plating of large bare steel gun tubes. The electrolytic process that generates emissions are (1) electrocleaning (caustic strip and caustic clean), (2) electropolishing, (3) electroplating, and (4) electrolytic purification (EP) of used chromic acid. There are six (6) water rinse tanks for each plating line that are not vented and are trivial sources pursuant to 201-3.3(c)(94). Emissions from the electrolytic processes include chromium (hexavalent and trivalent) as well as caustic and acid mists, which are controlled by a pacled-bed scrubber with composite mesh pad (CMP) mist eliminator mist eliminator. The 120 Electroplating (Majors) Line has a maximum cumulative rectifier capacity of greater than 60 million



ampere-hours per year and is considered a large, hard chromium electroplating facility pursuant to 40 CFR 63 Subpart N.

The existing scrubber is scheduled to be replaced by a CMP scrubber with ultra-low particulate air (ULPA) filter in 2022. The rectifier capacity for several electrolytic tanks will also change as part of the project: TK207 rectifier will be reduced from 60,000 to 40,000 amps, TK307 rectifier will be reduced from 50,000 to 40,000 amps, and TK304 rectifier will be increased from 10,000 to 20,000 amps.

Emission Source/Control: SCD01 - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 207EP - Process

Emission Source/Control: 307EP - Process

Emission Source/Control: TK201 - Process

Emission Source/Control: TK204 - Process

Emission Source/Control: TK207 - Process

Emission Source/Control: TK301 - Process

Emission Source/Control: TK304 - Process

Emission Source/Control: TK307 - Process

Item 22.11(From Mod 1):

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

Emission Unit: U-ELPLT

Process: PL2 Source Classification Code: 3-09-010-01

Process Description:

This process is the Minors Electroplating Line 1, which is used for electroplating and repair plating of smaller cannon components and other small DoD components. Prior to electroplating, the components go through a series of cleaning, rinsing, and surface preparation steps, including electropolishing and passivating. These pre-plating processes are associated with Process ID PL2. There are four (4) tanks (Stations) that are used for electrolytic process in the Minors Electroplating Line 1, one (1) electropolishing tank, which is associated with Process ID PL2, and three (3) hard chromium electroplating tanks, which are associated with Process ID PL3. There are seven (7) water rinse stations used in the pre-plating process, which are trivial sources pursuant to 201-3.3(c)(94). The passivating tank (TK319) is physically



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located in Minors Line 3, but serves Minors Line 1, Process ID PL2.

Emission Source/Control: STA07 - Process

Design Capacity: 942 gallons

Emission Source/Control: STA14 - Process

Design Capacity: 3,000 amperes

Emission Source/Control: STA16 - Process

Design Capacity: 825 gallons

Emission Source/Control: TK319 - Process

Design Capacity: 707 gallons

Item 22.12(From Mod 1):

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

Emission Unit: U-ELPLT

Process: PL3 Source Classification Code: 3-09-010-18

Process Description:

This process is the Minors Electroplating Line 1, which is used for electroplating and repair plating of smaller cannon components and other small DoD components. Prior to electroplating, the components go through a series of cleaning, rinsing, and surface preparation steps, including electropolishing and passivating. These pre-plating processes are associated with Process ID PL2. There are four (4) tanks (Stations) that are used for electrolytic process in the Minors Electroplating Line 1, one (1) electropolishing tank, which is associated with Process ID PL2, and three (3) hard chromium electroplating tanks, which are associated with Process ID PL3. The reverse etch tank (STA28) listed in Process ID PL3 is no longer in operation. Each electroplating tank can be operated in electroplating mode or repair mode. Repair mode is the electroplating of a small/specific area of previously plated components and therefore, will have less emissions than electroplating mode. Emissions from the electroplating tanks include chromium (hexavalent and trivalent) and acid mists, which are controlled by two (2) composite mesh pad scrubbers operating in parallel (SCD02 and SCD03). The Minors Electroplating Line 1 has a maximum cumulative rectifier capacity of greater than 60 million ampere-hours per year and is considered a large, hard chromium electroplating facility pursuant to 40 CFR 63 Subpart N.

Emission Source/Control: SCD02 - Control Control Type: COMPOSITE MESH-PAD

Emission Source/Control: SCD03 - Control Control Type: COMPOSITE MESH-PAD



Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

Emission Source/Control: STA30 - Process

Design Capacity: 3,000 amperes

Emission Source/Control: STA32 - Process

Design Capacity: 3,000 amperes

Emission Source/Control: STA33 - Process

Design Capacity: 3,000 amperes

Item 22.13(From Mod 1):

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

Emission Unit: U-ELPLT

Process: PL5 Source Classification Code: 3-09-010-18

Process Description:

This process is the Minors Line 3, which is used for manganese conditioning and phosphating of smaller cannon

components and other small DoD components. There is no electrolytic process in Line 3. The components are dipped

in a manganese phosphate conditioner prior to being dipped in a manganese phosphate solution. After phosphating,

the components are rinse/sealed using a dilute chromic acid solution. Select components then dipped in an oil quench

and afterwards, the equipment used in the oil quench is cleaned with caustic (alkaline) cleaners and rinsed. There are

two (2) water rinse/spray tanks and two (2) alkaline cleaning tanks (TK308 and TK310) used in the phosphating

process. The water rinse/spray tanks and alkaline cleaning tanks are trivial sources pursuant to 201-3.3 (c)(94) and

201-3.3(c)(48), respectively.

Emission Source/Control: TKM02 - Process

Design Capacity: 692 gallons

Emission Source/Control: TKM03 - Process

Design Capacity: 682 gallons

Emission Source/Control: TKM04 - Process

Design Capacity: 707 gallons

Emission Source/Control: TKM06 - Process

Design Capacity: 692 gallons

Item 22.14(From Mod 1):

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

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Emission Unit: U-ELPLT

Process: PL6 Source Classification Code: 4-02-025-01

Process Description:

This process is the spray application and curing of a solid-film lubricant on the metal cannon barrels and other

associated metal components. The material is a military specification coating used for the purpose of inhibiting

corrosion, reducing wear, and prevention of galling, corrosion, and seizure of the metal. The material is applied using a high volume low pressure (HVLP) sprayer within a file

high volume, low pressure (HVLP) sprayer within a film coating booth (Process PL6) and then the coated components

are transferred to either the large electric oven or the small electric oven for curing (Process PL7). Emissions from this

process are assumed to be emitted from the coating booth only with negligible emissions from the curing ovens.

Particulate emissions from oversprays in the film coating booth are controlled by a waterfall scrubber (SCD05) within the

coating booth. The waterfall scrubber exhaust is vented through two identical stacks that operate simultaneously.

Emission Source/Control: SCD05 - Control

Control Type: WATER CURTAIN

Emission Source/Control: SB001 - Process

Item 22.15(From Mod 1):

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

Emission Unit: U-ELPLT

Process: PL7 Source Classification Code: 4-02-025-01

Process Description:

This process is the spray application and curing of a solid-film lubricant on the metal cannon barrels and other

associated metal components. The material is a military specification coating used for the purpose of inhibiting

corrosion, reducing wear, and prevention of galling, corrosion, and seizure of the metal. The material is applied using a

high volume, low pressure (HVLP) sprayer within a film coating booth (Process PL6) and then the coated components

are transferred to either the large electric oven or the small electric oven for curing (Process PL7). Emissions



from this

process are assumed to be emitted from the coating booth only with negligible emissions from the curing ovens.

Particulate emissions from oversprays in the film coating booth are controlled by a waterfall scrubber (SCD05) within

the coating booth. The waterfall scrubber exhaust is vented through two identical stacks that operate simultaneously.

Emission Source/Control: CU001 - Process

Emission Source/Control: CU002 - Process

Item 22.16(From Mod 1):

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

Emission Unit: U-ELPLT

Process: PL9 Source Classification Code: 3-09-010-18

Process Description:

This process is an Electroplating Line, which is intended to serve as a backup for an electroplating tank in the 120

Electroplating (Majors) Line (Emission Unit: U-ELPT, Process ID: PL 1). There is one (1) hard chromium electroplating

tank in the line. Emissions from the electroplating tank include chromium (hexavalent and trivalent) and acid mists.

which are controlled by one (1) three-stage composite mesh pad scrubber followed by a HEPA filter. The line has a

maximum cumulative rectifier capacity of greater than 60 million ampere-hours per year and is considered a large, hard

chromium electroplating facility pursuant to 40 CFR 63 Subpart N.

Emission Source/Control: SCD08 - Control Control Type: COMPOSITE MESH-PAD

Emission Source/Control: CT101 - Process

Design Capacity: 60,000 amperes

Condition 1-52: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

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

Item 1-52.1:

The Compliance Demonstration activity will be performed for:



Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

Emission Unit: 3-MANUF

Process: PNT Emission Source: 097EP

Regulated Contaminant(s):

CAS No: 018540-29-9 CHROMIUM(VI)

Item 1-52.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Upon installation of the new scrubber at Emission Point 00130, process emission of chromium (VI) shall be limited such that the facility-wide impact from all process emission sources of chromium (VI) is less than the annual Guideline Concentration (AGC) of 2.0E-05 microgram per cubig meter (ug/m3).

The maximum annual emisssion of chromium (VI) for Emission Point EP097 is currently 0.0157 lb/year based on the May 2020 air dispersion modeling. The facility is allowed to increase or decrease the maximum annual emission as long as the facility-wide impact from all process emission sources of chromium (VI) remains below the AGC.

Emission point EP097 is subject to compliance monitoring to ensure the facility-wide impact from process emission sources of chromium (VI) does not exceed the AGC, by monitoring the Cr(VI) emission and tracking the coating usage on a monthly basis using the following equations:

Monthly emission (lb/month) = Monthly coating usage (gal/month) x coating density (lb/gal) x Cr(VI) wt% x (1-transfer efficiency%) x (1-control efficiency%)

Rolling 12-month emission (lb/yr) = Monthly emission (lb/month) + Previous 11 months emission (lb/11-month)

Parameter Monitored: CHROMIUM(VI)

Upper Permit Limit: 2.0E-05 micrograms per cubic meter

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 1-53: Compliance Demonstration

Effective between the dates of 04/22/2022 and 09/27/2030

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

Item 1-53.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Process: PL1

Regulated Contaminant(s):

CAS No: 018540-29-9 CHROMIUM(VI)

Item 1-53.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Upon installation of the new scrubber at Emission Point 00130, process emission of chromium (VI) shall be limited such that the facility-wide impact from all process emission sources

of chromium (VI) is less than the Annual Guideline Concentration (AGC) of 2.0E-05 microgram per cubic meter (ug/m3).

The facility-wide impact will be determined using air dispersion modeling (AERMOD) conducted in accordance with the

approved air dispersion modeling protocol and Policy DAR-10: NYSDEC Guidelines on Dispersion Modeling

Procedures for Air Quality Impact Analysis.

The maximum annual emission of chromium (VI) for Emission Point 00130 is currently 0.05500 lb/yr based on the May

2020 air dispersion modeling. The facility is allowed to increase or decrease the maximum annual emission as long as

the facility-wide impact from all process emission sources of chromium (VI) remains below the AGC.

Emission Point 00130 is subject to compliance monitoring to ensure the facility-wide impact from process emission

sources of chromium (VI) does not exceed the AGC. The facility will comply with the requirement by monitoring the

emissions of chromium (VI) and operating amps (A-hr) on a monthly basis. On a monthly basis, the facility will calculate

the previous month's emissions and the 12-month rolling emissions. The emissions are calculated using the following

formulas:



- Monthly Emission (lbs/month) = Operating amps (A-hr/month) x Controlled emission factor (lb/A-hr)
- -12-month Rolling Emissions (lbs/12-month) = Monthly Emission (lbs/month)+ Previous 11-month Emissions

(lbs/11-months)

Controlled emission factor for Chromium (VI) will be determined from stack testing.

Parameter Monitored: CHROMIUM(VI)

Upper Permit Limit: 2.0E-05 micrograms per cubic meter

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 1-54: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

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

Item 1-54.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT

Process: PL9

Regulated Contaminant(s):

CAS No: 018540-29-9 CHROMIUM(VI)

Item 1-54.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Upon installation of the new scrubber at Emission Point 00130, Process emission of chromium (VI) shall be limited such that the facility-wide impact from all process

emission sources

of chromium (VI) is less than the Annual Guideline

Concentration (AGC) of 2.0E-05 microgram per cubic meter

(ug/m3).

The facility-wide impact will be determined using air

dispersion modeling (AERMOD) conducted in accordance with

the

approved air dispersion modeling protocol and Policy DAR-10: NYSDEC Guidelines on Dispersion Modeling

Procedures for Air Quality Impact Analysis.

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The maximum annual emission of chromium (VI) for Emission Point 0024A is currently 0.003394 lb/yr based on the May

2020 air dispersion modeling. The facility is allowed to increase or decrease the maximum annual emission as long as

the facility-wide impact from all process emission sources of chromium (VI) remains below the AGC.

Emission Point 0024A is subject to compliance monitoring to ensure the facility-wide impact from process emission

sources of chromium (VI) does not exceed the AGC. The facility will comply with the requirement by monitoring the

emissions of chromium (VI) and operating amps (A-hr) on a monthly basis. On a monthly basis, the facility will calculate

the previous month's emissions and the 12-month rolling emissions. The emissions are calculated using the following

formulas:

- Monthly Emission (lbs/month) = Operating amps (A-hr/month) x Uncontrolled emission factor (lb/A-hr) x Scrubber

control efficiency (%)

-12-month Rolling Emissions (lbs/12-month) = Monthly Emission (lbs/month)+ Previous 11-month Emissions

(lbs/11-months)

Parameter Monitored: CHROMIUM(VI)

Upper Permit Limit: 2.0E-05 micrograms per cubic meter

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 1-55: Compliance Demonstration Effective between the dates of 04/22/2022 and 09/27/2030

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

Item 1-55.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-ELPLT Emission Point: 00155

Process: PL3

Regulated Contaminant(s):

CAS No: 018540-29-9 CHROMIUM(VI)

Air Pollution Control Permit Conditions

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Item 1-55.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Upon installation of the new scrubber at Emission Point

00130, process emission of chromium (VI) shall be limited such that the facility-wide impact from all process emission sources

of chromium (VI) is less than the Annual Guideline Concentration (AGC) of 2.0E-05 microgram per cubic meter (ug/m3).

The facility-wide impact will be determined using air dispersion modeling (AERMOD) conducted in accordance with the

approved air dispersion modeling protocol and Policy DAR-10: NYSDEC Guidelines on Dispersion Modeling

Procedures for Air Quality Impact Analysis. The maximum annual emission of chromium (VI) for Emission Point 00155 is currently 0.08284 lb/yr based on the May

2020 air dispersion modeling. The facility is allowed to increase or decrease the maximum annual emission as long as

the facility-wide impact from all process emission sources of chromium (VI) remains below the AGC.

Emission Point 00155 is subject to compliance monitoring to ensure the facility-wide impact from process emission

sources of chromium (VI) does not exceed the AGC. The facility will comply with the requirement by monitoring the

emissions of chromium (VI) and operating amps (A-hr) on a monthly basis. On a monthly basis, the facility will calculate

the previous month's emissions and the 12-month rolling emissions. The emissions are calculated using the following

formulas:

 Monthly Emission (lbs/month) = Operating amps (A-hr/month) x Uncontrolled emission factor (lb/A-hr) x Scrubber

control efficiency (%)

-12-month Rolling Emissions (lbs/12-month) = Monthly Emission (lbs/month)+ Previous 11-month Emissions

(lbs/11-months)

Parameter Monitored: CHROMIUM(VI)

Upper Permit Limit: 2.05E-05 micrograms per cubic meter



Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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



Permit ID: 4-0118-00001/02003 Facility DEC ID: 4011800001