Facility DEC ID: 9060300001

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-0603-00001/00042
Effective Date: 07/11/2022 Expiration Date: 07/10/2032

Permit Issued To:DUNKIRK SPECIALTY STEEL LLC
830 BRIGHAM RD
PO BOX 319
DUNKIRK, NY 14048-0319

Contact: Michael Alderson
Universal Stainless and Alloy Products
600 Mayer St
Bridgeville, PA 15017
(330) 599-7011

Facility: DUNKIRK SPECIALTY STEEL LLC
830 BRIGHAM RD
DUNKIRK, NY 14048

Contact: Joshua Warren
830 Brigham Rd
Dunkirk, NY 14048
(716) 366-1000

Description:
(1) Dunkirk Specialty Steel, LLC owns and operates a specialty steel processing facility located at 830 Brigham Road, City of Dunkirk, New York. The facility receives stainless steel billets as raw material and processes the billets into specialty steel bar, rod, and wire products. The primary manufacturing operations used to process the billets include annealing, pickling, rolling, and finishing. Three SIC codes apply to this facility including: 3312 - Blast Furnaces and Steel Mills; 3315 - Steel Wire and Related Products; and 3398- Metal Heat Treating.

(2) This Air State Facility permit renewal (Ren 1 Mod 0) is for the continued operation of the facility air emission sources. The air pollution sources at Dunkirk Specialty Steel emit air pollutants consisting mainly of particulate matter (PM-10), combustion by-products, and acid vapors. Dunkirk Specialty Steel is a natural minor source of sulfur dioxide (SO2), carbon monoxide (CO), volatile organic compounds (VOC), PM-10, and total and individual hazardous air pollutant (HAP) emissions. Dunkirk Specialty Steel is a synthetic minor source of nitrogen oxides (NOx) emissions.

(3) The facility shall continue to limit NOx emissions equal to or less than 90 tons per year during any consecutive 12-month period. The facility accepted and has maintained this federally enforceable emission limit (cap) to avoid applicability to Title V permitting and to Part 212, Part 216 and Part 227-2 NOx RACT regulatory requirements.

(4) The emissions generated during the steel cutting and grinding, and other process sources are regulated under 6NYCRR Part 212. These sources are regulated by an opacity limit and an

allowable particulate emission rate. Compliance with the particulate grain loading and opacity requirements are completed by an inspection and maintenance program of the particulate control equipment.

(5) Acid gas emissions from the pickling process are regulated under 6NYCRR Part 212. Hydrogen fluoride emissions are controlled using a caustic packed tower scrubbing system. An alkaline addition system is used to maintain the proper pH of the system. The hydrogen fluoride pickling process is limited to an annual total pickling time of 5,840 hours. The packed tower shall be stack tested once every ten years to demonstrate compliance with Part 212 and demonstrate a 100% capture rate.

(6) The particulate emissions generated from the process furnaces, including annealing furnaces and reheating furnaces, are regulated under 6NYCRR Part 216. These sources are regulated by an opacity limit and an allowable particulate emission rate.

(7) The individual solvent cleaning devices are subject to the requirements of 6 NYCRR Part 226-1.

(8) Two (2)-300 hp spark ignition emergency generators built in 1960 are subject to the requirements of 40CFR Part 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

(9) The renewal application for this Air State Facility Permit must be submitted to the department at least 180 days, but not more than 18 months, prior to the date of permit expiration. While the renewal application is being processed by the department, the owner or operator of the facility may continue to operate under the terms and conditions of the existing permit, provided the application is submitted in accordance with 6NYCRR Part 201-5.2(c).

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: LISA M CZECHOWICZ
NYSDEC - REGION 9
700 Delaware Ave
BUFFALO, NY 14209

Authorized Signature: _____ Date: ___ / ___ / _____

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.

PAGE LOCATION OF CONDITIONS

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

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

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

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

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

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

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

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.

Facility DEC ID: 9060300001

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 9 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 9 Headquarters
Division of Environmental Permits
700 Delaware Ave.,
Buffalo, NY 14209
(716) 851-7130

Permit ID: 9-0603-00001/00042 **Facility DEC ID: 9060300001**

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:DUNKIRK SPECIALTY STEEL LLC
830 BRIGHAM RD
PO BOX 319
DUNKIRK, NY 14048-0319

Facility: DUNKIRK SPECIALTY STEEL LLC
830 BRIGHAM RD
DUNKIRK, NY 14048

Authorized Activity By Standard Industrial Classification Code:
3312 - BLAST FURNACES AND STEEL MILLS
3315 - STEEL WIRE AND RELATED PRODUCTS
3398 - METAL HEAT TREATING

Permit Effective Date: 07/11/2022 Permit Expiration Date: 07/10/2032

PAGE LOCATION OF CONDITIONS

PAGE

EU=F-00000

56 31 6 NYCRR 212-3.1: Compliance Demonstration

EU=F-00000,Proc=FCL,ES=00F03

57 32 6 NYCRR 212-1.7 (a): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.

FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/FINAL ****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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 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: Non Applicable requirements
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 201-6.4 (g)

Item 1.1:
This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6 NYCRR Subpart 227-2
Reason: Dunkirk Specialty Steel is not subject to 6NYCRR Part 227-2 NOx RACT for Major Facilities because the facility has limited (capped) NOx emissions below major source thresholds. The facility operates exempt combustion installations including two (2) natural gas emergency generators less than 400 brake horsepower and heating units less than 1 MMBtu/hr. All other combustion installations are regulated under other rules including Part 212 and Part 216.

40 CFR 63.1155
Reason: Dunkirk Specialty Steel is not subject to "40 CFR 63 Subpart CCC - National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Generation Plants" because the facility does not use a hydrochloric acid solution in the pickling process. In addition, Dunkirk Specialty Steel is a minor source of total and individual HAP emissions, so it is below the applicability thresholds of the rule.

Condition 2: Facility Permissible Emissions
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 2.1:
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: 0NY210-00-0 PTE: 180,000 pounds per year
Name: OXIDES OF NITROGEN

Condition 3: Capping Monitoring Condition
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 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
6 NYCRR 212-3.1 (e)
6 NYCRR 216.5 (e)
6 NYCRR Subpart 227-2

Item 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 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 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 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 3.6:
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 3.7:
Compliance Demonstration shall include the following monitoring:

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

Part 201-7 FACILITY-WIDE NOx EMISSION CAP

(1) On October 20, 1994, the facility submitted a Nitrogen Oxide Reasonably Available Control Technology (NOx RACT) Compliance Plan in accordance with the draft memorandum issued by Mr. Tom Allen on October 1, 1994, entitled (Draft) "NOx and VOC RACT Compliance Plans". The Compliance Plan identified actions required to be in compliance by the June 1, 1995 compliance date with Part 212.10 "RACT for Major Facilities"; Part 227-2 "NOx RACT for Combustion Sources"; and Part 216.5 "Gaseous Emissions" for Iron and/or Steel Processes. The Compliance Plan stated the facility will use the capping option to bring the facility into compliance with NOx emissions.

(2) The facility accepted and has maintained a federally enforceable emission limit (cap) to avoid applicability to Title V permitting and to the above identified NOx RACT regulatory requirements. The facility shall continue to limit NOx emissions equal to or less than 90 tons per year during any consecutive 12-month period.

(3) On-going compliance monitoring of the total NOx emission limit shall be documented based on monthly emission calculations, as determined by summing the individual monthly emissions during any consecutive 12-month period.

(4) The facility shall maintain fuel use records and other applicable documentation to demonstrate the emission calculations are verifiable and enforceable. Records shall be maintained for five years and be made available upon request.

(5) On an annual basis, the responsible official shall provide a report documenting the monthly and 12-month rolling emissions from the previous year and a

certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap.

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 90 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH 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 4: Visible Emissions Limited
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 211.2

Item 4.1:
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 5: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

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

Item 5.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: A-00000

Emission Unit: B-00000

Emission Unit: C-00000

Emission Unit: D-00000

Emission Unit: I-00000

Emission Unit: J-00000

Emission Unit: L-00000

Item 5.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE
Monitoring Description:

20% PERCENT OPACITY LIMIT
PROCESS SOURCES INCLUDING
STEEL CUTTING & GRINDING, OIL QUENCH, STORAGE TANKS & WWT

LIMITING OF OPACITY – Section 212-1.6(a)
(1) As required by 6NYCRR Part 212-1.6(a), no person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.
(2) Compliance with this requirement shall be determined by the facility owner/operator conducting a routine survey of visible emissions when a process is in operation. Visible emission observations shall be performed, as best as possible, at a location to obtain the proper sun angle, background, and line of sight as required by EPA Method 9. The observer must be knowledgeable regarding the effects on the visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor)
(3) Visible emissions are not expected when each source and any associated control equipment are properly operated. If any visible emissions are identified, inspect the source and restore operation of the emission unit (including the control device, if any, and the associated capture system) to its normal operation as expeditiously as practicable.
(4) Records of any excess visible emission event shall be maintained to include the date and length of time any visible emissions were observed, and the corrective action taken. The records shall be kept on-site and made available to the Department upon request.
(5) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation from any process emission source.
(6) Upon request, a written report of any visible emission event shall be submitted to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Compliance Demonstration

Effective between the dates of 07/11/2022 and 07/10/2032

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

Item 6.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: A-00000

Emission Unit: B-00000

Emission Unit: C-00000

Emission Unit: D-00000

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

Item 6.2:
Compliance Demonstration shall include the following monitoring:

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

STEEL CUTTING & GRINDING
PROCESS SOURCES Before July 1, 1973
PARTICULATE EMISSIONS - Section 212-2.4(b)

Emissions from any process emission source for which an application was received by the department prior to July 1, 1973 are restricted as follows:
(1) No facility owner or operator shall cause or allow emissions of particulate that exceed 0.15 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

(2) On-going compliance monitoring of the particulate emission limit for each steel cutting and grinding process source with an application received before July 1, 1973 shall be monitored as stated below:
(i) Each particulate control device must be operated and maintained according to manufacturer specifications.
(ii) If the control device is not operating as specified by the manufacturer or particulate fall-out is observed, then inspect the source, initiate corrective action, and restore operation of the particulate control device and associated capture system to its normal operation as expeditiously as practicable.

(3) Records shall be maintained to include maintenance

logs and a record of corrective action taken (if any). The records shall be kept on-site and be made available to the Department upon request.

(4) At the discretion of the Department, an EPA Method 5 compliance test may be required to demonstrate compliance with the 0.15 grains/dscf emission limit.

(5) Upon request, a written report of any corrective action event shall be submitted to the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.15 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

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

Item 7.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: A-00000

Emission Unit: B-00000

Emission Unit: C-00000

Emission Unit: D-00000

Emission Unit: I-00000

Emission Unit: J-00000

Emission Unit: L-00000

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

Item 7.2:
Compliance Demonstration shall include the following monitoring:

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

PROCESS SOURCES - STEEL CUTTING & GRINDING, OIL QUENCH, STORAGE TANKS & WWT After July 1, 1973

PARTICULATE EMISSIONS - Section 212-2.4(b)

The control of particulate emissions released from new and modified process emission sources for which an application was received by the department after July 1, 1973 are restricted as follows:
(1) 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.

(2) On-going compliance monitoring of the particulate emission limit for each process source with an application received after July 1, 1973 shall be monitored as stated below:
(i) Each particulate control device must be operated and maintained according to manufacturer specifications.
(ii) If the control device is not operating as specified by the manufacturer or particulate fall-out is observed, then inspect the source, initiate corrective action, and restore operation of the particulate control device and associated capture system to its normal operation as expeditiously as practicable.

(3) Records shall be maintained to include maintenance logs and a record of corrective action taken (if any). The records shall be kept on-site and be made available to the Department upon request.

(4) At the discretion of the Department, an EPA Method 5 compliance test may be required to demonstrate compliance with the 0.050 grains/dscf emission limit.

(5) Upon request, a written report of any corrective action event shall be submitted to the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Particulate emission limit
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 216.3

Item 8.1:
Any iron and/or steel process must not cause or allow emissions of particulates from any confined process to exceed the limits contained in Table 1 of Part 216 or as listed in this permit.

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

Condition 9: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 9.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):
CAS No: 007664-93-9 SULFURIC ACID

Item 9.2:
Compliance Demonstration shall include the following monitoring:

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

PART 212 EVALUATION
SULFURIC ACID EMISSIONS
PICKLING TANK F01, EP F0154 - NO CONTROLS
PICKLING TANK F03, EP F0156 - CONTROLS

(1) Sulfuric acid is emitted from two pickling tanks including the sulfuric acid pickling tank (emission source 00F01 through emission point F0154) and the hydrofluoric-sulfuric acid pickling tank (emission source 00F03 through emission point F0156). The most recent stack test for these sources was completed in February 2021 and the Part 212 analysis was completed in August 2021. The measured uncontrolled stack Emission Rate Potential (ERP) of sulfuric acid from pickling tank F01 was 0.06 pounds per hour (lb/hr). The measured stack ERP of sulfuric acid from the hydrofluoric-sulfuric acid pickling tank F03 was 0.06 lb/hr after controls. The hydrofluoric-sulfuric acid pickling tank is operated with a wet scrubber to control the hydrogen fluoride emissions. As a reference, the sulfuric acid emissions before the scrubber are 0.08 lb/hr. If the two pickling tanks are operated 8,760 hours per year, the maximum annual stack

emission rate of sulfuric acid from the facility would be 1,051 lbs/yr and the combined hourly rate is 0.12 lbs/hr..

(2) Sulfuric acid is not a High Toxicity Air Contaminant and is referred to as a non-HTAC. Department guidance, known as DAR-1, requires each non-HTAC emitted from process sources with facility-wide actual emissions greater than 100 pounds per year, to demonstrate compliance with the requirements of 6 NYCRR Part 212. The 1,051 lbs/yr ERP of sulfuric acid is greater than 100 lbs/yr and requires further evaluation.

(3) Sulfuric acid is given an initial environmental rating of C. In accordance with 6 NYCRR Part 212-2.3(b), Table 4, a source having an ERP less than 1 lb/hr with an environmental rating of C must use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The Aerscreen dispersion model analysis demonstrated the ERP of 0.12 lb/hr and 1,051 lbs/yr sulfuric acid emissions resulted in ambient concentrations below the SGC and AGC thresholds without the use of air pollution control equipment for sulfuric acid pickling tank F01. The modeled 1-hour and annual sulfuric acid concentration impacts were 8.62 ug/m3 and 0.86 ug.m3, respectively. In comparison, the NYS SGC and AGC are 120 ug/m3 and 1.00 ug/m3, respectively.

(4) Based on the Part 212 and DAR-1 analysis, the sulfuric acid pickling tank F01 does not require the use of pollution control equipment. The hydrofluoric-sulfuric acid pickling tank F03 requires emission controls to reduce the hydrogen fluoride emissions. Permit conditions for this control device are regulated under the Part 212 hydrogen fluoride permit conditions.

(5) At the discretion of the department, a revised Part 212 evaluation may be required with the next permit renewal due to regulatory or process changes.

(6) No records or reporting are required for this permit condition unless requested by the Department.

Parameter Monitored: SULFURIC ACID
Upper Permit Limit: 0 percent degree of air cleaning or greater
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 10.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):
CAS No: 007697-37-2 NITRIC ACID

Item 10.2:
Compliance Demonstration shall include the following monitoring:

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

PART 212 EVALUATION
NITRIC ACID EMISSIONS
PICKLING TANK F05, EP F0157 - NO CONTROLS

(1) Nitric acid is emitted from the nitric acid pickling tank (emission source 00F05 through emission point F0157). The most recent stack test for this source was completed in February 2021 and the Part 212 analysis was completed in August 2021. The measured uncontrolled stack Emission Rate Potential (ERP) of nitric acid from this emission point is 0.19 pounds per hour (lb/hr). If the nitric acid pickling tank operated 8,760 hours per year, the maximum annual stack emission rate of nitric acid from the facility would be 1,664 lbs/yr.

(2) Nitric acid is not a High Toxicity Air Contaminant and is referred to as a non-HTAC. Department guidance, known as DAR-1, requires each non-HTAC emitted from process sources with facility-wide actual emissions greater than 100 pounds per year, to demonstrate compliance with the requirements of 6 NYCRR Part 212. The 1,664 lbs/yr ERP of nitric acid is greater than 100 lbs/yr and requires further evaluation.

(3) Nitric acid is given an initial environmental rating of C. In accordance with 6 NYCRR Part 212-2.3(b), Table 4, a source having an ERP less than 1 lb/hr with an environmental rating of C must use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). The Aerscreen

dispersion model analysis demonstrated the ERP of 0.19 lb/hr and 1,664 lbs/yr nitric acid emissions resulted in ambient concentrations below the SGC and AGC thresholds without the use of air pollution control equipment in the nitric acid pickling tank F05. The modeled 1-hour and annual nitric acid concentration impacts were 14.03 ug/m3 and 1.4 ug.m3, respectively. In comparison, the NYS SGC and AGC are 86 ug/m3 and 12.3 ug/m3, respectively.

(4) Based on the Part 212 and DAR-1 analysis, the nitric acid pickling tank does not require the use of pollution control equipment.

(5) At the discretion of the department, a revised Part 212 evaluation may be required with the next permit renewal due to regulatory or process changes.

(6) No records or reporting are required for this permit condition unless requested by the Department.

Parameter Monitored: NITRIC ACID
Upper Permit Limit: 0 percent degree of air cleaning or greater
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 11.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000
Process: FCL

Regulated Contaminant(s):
CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 11.2:
Compliance Demonstration shall include the following monitoring:

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

DEMONSTRATING CONTINUOUS COMPLIANCE
SCRUBBER LIQUOR FLOWRATE BETWEEN 221 AND 271 GPM

PICKLING TANK 00F03, EP F0156, SCRUBBER 00F04

(1) A wet scrubber using a sodium hydroxide scrubber solution is used to reduce hydrogen fluoride emissions from hydrofluoric-sulfuric acid pickling tank 00F03. To demonstrate continued compliance with the 6 NYCRR Part 212 emission requirements, the facility shall operate and maintain the scrubber liquor flowrate as specified below.

(2) A continuous flow monitor must be operated at all times when the hydrofluoric-sulfuric acid pickling tank and wet scrubber are operating except during any quality assurance and routine maintenance activities. The monitor must be operated, calibrated and maintained according to the manufacturer quality assurance program. The flowrate should be recorded once per day when the source is operating.

(3) The manufacturer design scrubber liquor flowrate range is between 221 gallons per minute (gpm) and 271 gpm. The design operating flowrate range should be used to determine if the equipment is functioning properly. If the system is operating outside the flowrate range, the facility should initiate an investigation of the source and control equipment and complete any corrective action to restore the source to its normal operation as expeditiously as practicable.

(4) Records shall be maintained to include: (1) a log of the daily flowrate measurements when the source is operating, (2) identification of any periods where the flowrate was outside the operating range, (3) corrective action taken (if any) to restore the malfunctioning air pollution control or monitoring equipment to its normal or usual manner of operation, and (4) the cause of any flowrate measurements outside the operating range (if known). The records shall be kept on-site for 5 years and be made available to the Department upon request.

(5) There are no on-going reporting requirements for this condition. Notify the department within the time frame specified in 6NYCRR 201-1.4 of any equipment malfunctions resulting in emissions of air contaminants in excess of any emission standard.

Parameter Monitored: FLOW RATE
Lower Permit Limit: 221 gallons per minute
Upper Permit Limit: 271 gallons per minute
Monitoring Frequency: DAILY
Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 12.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000
Process: FCL

Regulated Contaminant(s):
CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 12.2:
Compliance Demonstration shall include the following monitoring:

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

DEMONSTRATING CONTINUOUS COMPLIANCE
SCRUBBER DIFFERENTIAL PRESSURE 3.5 TO 6 INCHES OF WATER
PICKLING TANK 00F03, EP F0156, SCRUBBER 00F04

(1) A wet scrubber using a sodium hydroxide scrubber solution is used to reduce hydrogen fluoride emissions from hydrofluoric-sulfuric acid pickling tank 00F03. To demonstrate continued compliance with the 6 NYCRR Part 212 emission requirements, the facility shall operate and maintain the scrubber differential pressure as specified below.

(2) A continuous differential pressure device must be operated at all times when the hydrofluoric-sulfuric acid pickling tank and wet scrubber are operating except during any quality assurance and routine maintenance activities. The monitor must be operated, calibrated and maintained according to the manufacturer quality assurance program. The differential pressure should be recorded once per day when the source is operating.

(3) The manufacturer design scrubber differential pressure range is between 3.5 and 6 inches of water. The design differential pressure range should be used to determine if the equipment is functioning properly. If the system is operating outside the differential pressure range, the facility should initiate an investigation of the source and control equipment and complete any corrective action

to restore the source to its normal operation as expeditiously as practicable.

(4) Records shall be maintained to include: (1) a log of the daily differential pressure measurements when the source is in operation, (2) identification of any periods where the differential pressure was outside the operating range, (3) corrective action taken (if any) to restore the malfunctioning air pollution control or monitoring equipment to its normal or usual manner of operation, and (4) the cause of any differential pressure measurements outside the operating range (if known). The records shall be kept on-site for 5 years and be made available to the Department upon request.

(5) There are no on-going reporting requirements for this condition. Notify the department within the time frame specified in 6NYCRR 201-1.4 of any equipment malfunctions resulting in emissions of air contaminants in excess of any emission standard.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 3.5 inches of water
Upper Permit Limit: 6 inches of water
Monitoring Frequency: DAILY
Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED RANGE EXCEPT DURING STARTUP/SHUTDOWN
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 13: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 13.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000
Process: FCL

Regulated Contaminant(s):
CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 13.2:
Compliance Demonstration shall include the following monitoring:

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

ANNUAL PICKLING OPERATING LIMIT
HYDROGEN FLUORIDE EMISSIONS

PICKLING TANK 00F03, EP F0156, SCRUBBER 00F04

(1) A wet scrubber using a sodium hydroxide scrubber solution is used to reduce hydrogen fluoride emissions from the hydrofluoric-sulfuric acid pickling tank 00F03. An AERMOD dispersion model was used to demonstrate compliance with the Part 212 annual impact evaluation based on a maximum operating pickling rate of 5,840 hours per year. This permit condition will document compliance with the annual guideline concentration (AGC) for the annual hydrogen fluoride emissions.

(2) The facility shall limit the annual total pickling time of the hydrofluoric-sulfuric acid pickling tank 00F03 equal to or less than 5,840 hours per year during any consecutive 12-month period.

(3) On-going compliance monitoring of the total hourly pickling operating limit shall be documented based on monthly pickling operating hours, as determined by summing the individual monthly pickling operating hours during any consecutive 12-month period.

(4) The facility shall maintain pickling operating records and other applicable documentation to demonstrate the information is verifiable and enforceable. Records shall be maintained for five years and be made available upon request.

(5) On an annual basis, the responsible official shall provide a report documenting the monthly and 12-month rolling pickling operating hours from the previous year and a certification to the Department that the facility has operated the pickling tank within the limits imposed by the emission cap.

(6) If the facility proposes to increase the total annual pickling operating hours to greater than 5,840 hours, then the air dispersion modeling needs to be re-evaluated.

Parameter Monitored: HOURS OF OPERATION
Upper Permit Limit: 5840 hours per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH 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 14: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 14.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000
Process: FCL

Regulated Contaminant(s):
CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 14.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

PART 212 EVALUATION
HYDROGEN FLUORIDE EMISSIONS
PICKLING TANK 00F03, EP F0156, SCRUBBER 00F04

(1) A wet scrubber using a sodium hydroxide scrubber solution is used to reduce hydrogen fluoride emissions from hydrofluoric-sulfuric acid pickling tank 00F03. The measured uncontrolled Emission Rate Potential (ERP) of hydrogen fluoride from this emission point is 3.44 pounds per hour (lbs/hr). After controls, the actual annual hydrogen fluoride emissions are 350 lbs/yr based on an operating rate of 5,840 hours per year.

(2) Hydrogen fluoride is not a High Toxicity Air Contaminant and is referred to as a non-HTAC. Department guidance, known as DAR-1, requires each non-HTAC emitted from process sources with facility-wide actual emissions greater than 100 pounds per year, to demonstrate compliance with the requirements of 6 NYCRR Part 212. The 350 lbs/yr actual emission rate is greater than 100 lbs/yr and requires hydrogen fluoride emissions be further evaluated.

(3) Hydrogen fluoride is given an initial environmental rating of B. In accordance with 6 NYCRR Part 212-2.3(b), Table 4, a source having an ERP less than 10 lbs/hr with an environmental rating of B must use air dispersion modeling to demonstrate that the maximum offsite air concentration is less than the short-term guideline concentration (SGC) and annual guideline concentration (AGC). An AERMOD dispersion model analysis demonstrated that a reduced emission rate of 0.057 lb/hr and 350 lbs/yr hydrogen fluoride emissions resulted in ambient concentrations below the SGC and AGC thresholds. The

modeled 1-hour and annual hydrogen fluoride concentration impacts were 2.92 ug/m3 and 0.062 ug.m3, respectively. In comparison, the NYS SGC and AGC are 5.6 ug/m3 and 0.071 ug/m3, respectively.

(4) A performance test was completed in February 2021 where the inlet and outlet hydrogen fluoride emission rates were measured at 3.44 lbs/hr and 0.056 lb/hr, respectively, resulting in a control efficiency of 98%. The AERMOD impacts from these emissions are below the SGC and AGC, thus, demonstrating compliance with Part 212.

(5) A performance test to demonstrate compliance with the Part 212 impact requirements for hydrogen fluoride emissions from the wet scrubber shall be completed once per permit term and be conducted at the maximum normal operating process load. This permit condition shall document compliance with the SGC of 5.6 ug/m3 based on the measured hourly hydrogen fluoride emission rate. Compliance with the AGC of 0.071 ug/m3 is based on a reduced annual operating limit of 5,840 hours referenced under a separate permit condition.

(6) A performance test protocol shall be submitted to the Department for approval at least 9 months prior to the permit expiration date. The Department must be notified 10 days prior to the scheduled test date so a department representative may be present during the test.

(7) The results of the performance test and impact modeling shall be submitted to the Department within 60 days following completion of the performance test.

(8) The Department reserves the right to require a performance test prior to the end of the permit term if deemed appropriate.

Parameter Monitored: HYDROGEN FLUORIDE
Upper Permit Limit: 5.6 micrograms per cubic meter
Reference Test Method: EPA Reference Method 26A
Monitoring Frequency: ONCE EVERY TEN YEARS
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 15: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 15.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000
Process: FCL

Regulated Contaminant(s):
CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 15.2:
Compliance Demonstration shall include the following monitoring:

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

DEMONSTRATING CONTINUOUS COMPLIANCE
SCRUBBER LIQUOR pH 8.5 OR GREATER
PICKLING TANK 00F03, EP F0156, SCRUBBER 00F04

(1) A wet scrubber using a sodium hydroxide scrubber solution is used to reduce hydrogen fluoride emissions from hydrofluoric-sulfuric acid pickling tank 00F03. To demonstrate continued compliance with the 6 NYCRR Part 212 emission requirements, the facility shall operate and maintain the scrubber liquor pH as specified below.

(2) A continuous pH monitor must be operated at all times when the hydrofluoric-sulfuric acid pickling tank and wet scrubber are operating except during any quality assurance and routine maintenance activities. The monitor must be operated, calibrated and maintained according to the manufacturer quality assurance program. The pH should be recorded once per day when the source is operating.

(3) The manufacturer optimal design scrubber pH range is between 8.5 and 10.5 standard units. Only the lower pH range requires monitoring because a pH greater than the design range results in a greater removal efficiency of hydrogen fluoride. The lower design operating range should be used to determine if the equipment is functioning properly. If the pH is operating outside the lower design range, the facility should initiate an investigation of the source and control equipment and complete any corrective action to restore the source to its normal operation as expeditiously as practicable.

(4) Records shall be maintained to include: (1) a log of the once per day pH measurements when the source is operating, (2) identification of any periods where the pH was outside the lower operating range, (3) corrective

action taken (if any) to restore the malfunctioning air pollution control, or monitoring equipment to its normal or usual manner of operation, and (4) the cause of any pH measurements outside the lower operating range (if known). The records shall be kept on-site for 5 years and be made available to the Department upon request.

(5) There are no on-going reporting requirements for this condition. Notify the department within the time frame specified in 6NYCRR 201-1.4 of any equipment malfunctions resulting in emissions of air contaminants in excess of any emission standard.

Parameter Monitored: PH
Lower Permit Limit: 8.5 pH (STANDARD) units
Monitoring Frequency: DAILY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 16: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 16.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: G-00000

Item 16.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

40CFR 63 SUBPART ZZZZ- Table 2d
TWO (2)-300 HP SPARK IGNITION
EMERGENCY GENERATORS BUILT IN 1960

(1) You must comply with the requirements in Table 2d. Operate the emergency engines as follows: [§63.6603(a) and Table 2d, Item 5]
(a) Change oil and filter every 1,440 hours of operation or annually, whichever comes first;
(b) Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first; and
(c) Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

(2) You must operate and maintain the stationary RICE and

after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e) and Table 6, Item 9]

(3) Install a non-resettable hour meter if one is not already installed; [§63.6625(f)]

(4) Minimize the engine's time spent at idle during startup and minimize the engine's startup time, not to exceed 30 minutes; and [§63.6625(h)]

(5) You have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. [§63.6625(j)]

(6) You must operate the emergency stationary RICE according to the following requirements: [§63.6640(f)]
(a) There are no limits on hours of operation for emergency service; [§63.6640(f)(1)]
(b) Maintenance checks and readiness testing is limited to 100 hours per year; [§63.6640(f)(2)]
(c) Operate the emergency engine up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing; [§63.6640(f)(3)]
(d) Engine cannot be used for peak shaving or as part of financial arrangement with another entity, except 15 of the 50 non-emergency hrs/yr can be used for demand response in emergency situations (e.g., imminent blackout) [§63.6640(f)(4)]; and
(e) If you do not operate the engine according to the regulation, the engine will not be considered an emergency engine and will need to meet all requirements for non-emergency engines. [§63.6640(f)]

(7) Keep records of the maintenance conducted on the emergency engine in order to demonstrate that you operated and maintained the engine according to your own maintenance plan. [§63.6655(e)]

(8) Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and

how many hours are spent for non-emergency operation. [§63.6655(f)]

(9) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

(10) There are no on-going reporting requirements for this permit condition.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 216.3

Item 17.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: H-00000

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

Item 17.2:
Compliance Demonstration shall include the following monitoring:

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

ANNEALING AND REHEATING FURNACES ON OR BEFORE 7/1/1973
PART 216 REQUIREMENTS

APPLICABILITY – Section 216.2
(a) This Part applies for all iron and/or steel processes where the application for a permit to construct was received on or before 7/1/1973.
(b) Dunkirk Specialty Steel operates annealing and reheat furnaces that are defined in Part 216.1(e)(12) as process furnaces in the iron and/or steel industry.

PARTICULATE EMISSIONS – Section 216.3
Owners or operators of any iron and/or steel process must not cause or allow emissions of particulates from any

confined process to exceed the limits contained in Table 1 of this Part as follows:

(a) As listed in Table 1 under the source category 'Other confined iron and/or steel processes' (which includes the annealing and reheat furnaces), the mass emission limit in grains/cubic foot of exhaust gas at standard conditions on a dry gas basis is 0.15.

(b) On-going compliance monitoring of the particulate emission limit for each annealing and reheating furnace where the application for a permit to construct was received on or before 7/1/1973 shall be monitored as stated below:

(i) Each furnace must be operated and maintained according to manufacturer specifications.

(ii) If the furnace is not operating as specified by the manufacturer or particulate fall-out is observed, then inspect the source, initiate corrective action, and restore operation of the furnace and associated capture system to its normal operation as expeditiously as practicable.

(c) Records shall be maintained to include maintenance logs and a record of corrective action taken (if any). The records shall be kept on-site and be made available to the Department upon request.

(d) At the discretion of the Department, an EPA Method 5 compliance test may be required to demonstrate compliance with the 0.15 grains/dscf emission limit.

(e) Upon request, a written report of any correct action event shall be submitted to the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.15 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 216.3

Item 18.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: H-00000

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

Item 18.2:
Compliance Demonstration shall include the following monitoring:

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

ANNEALING AND REHEATING FURNACES AFTER 7/1/1973
PART 216 REQUIREMENTS

APPLICABILITY – Section 216.2
(a) This Part applies for all iron and/or steel processes where the application for a permit to construct was received after 7/1/1973.
(b) Dunkirk Specialty Steel operates annealing and reheat furnaces that are defined in Part 216.1(e)(12) as process furnaces in the iron and/or steel industry.

PARTICULATE EMISSIONS – Section 216.3
Owners or operators of any iron and/or steel process must not cause or allow emissions of particulates from any confined process to exceed the limits contained in Table 1 of this Part as follows:
(a) As listed in Table 1 under the source category 'Other confined iron and/or steel processes' (which includes the annealing and reheat furnaces), the mass emission limit in grains/cubic foot of exhaust gas at standard conditions on a dry gas basis is 0.050.
(b) On-going compliance monitoring of the particulate emission limit for each annealing and reheating furnace where the application for a permit to construct was received after 7/1/1973 shall be monitored as stated below:
(i) Each furnace must be operated and maintained according to manufacturer specifications.
(ii) If the furnace is not operating as specified by the manufacturer or particulate fall-out is observed, then inspect the source, initiate corrective action, and restore operation of the furnace and associated capture system to its normal operation as expeditiously as practicable.
(c) Records shall be maintained to include maintenance logs and a record of corrective action taken (if any). The records shall be kept on-site and be made available to the Department upon request.
(d) At the discretion of the Department, an EPA Method 5 compliance test may be required to demonstrate compliance with the 0.050 grains/dscf emission limit.
(e) Upon request, a written report of any correct action event shall be submitted to the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 216.4

Item 19.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: H-00000

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

Item 19.2:
Compliance Demonstration shall include the following monitoring:

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

ANNEALING AND REHEATING FURNACES
PART 216 OPACITY REQUIREMENTS

APPLICABILITY – Section 216.2
(a) This Part applies for all iron and/or steel processes except for ferrous jobbing foundries subject to Part 213 and ferro alloy production furnaces subject to Part 212 of this Title.
(b) Dunkirk Specialty Steel operates annealing and reheat furnaces that are defined in Part 216.1(e)(12) as process furnaces in the iron and/or steel industry.

OPACITY OF EMISSIONS – Section 216.4
(a) Owners or operators of any iron and/or steel process must not cause or allow emissions from that process to have an opacity, determined by the method of subdivision (b) of this section, which exceed the limits contained in Table 2 of this Part, unless exempted under section 216.10(b) or (c) of this Part.
(b) Compliance with the opacity standards will be determined by observing visible emissions discharged during the operation of the iron and/or steel process. The

observer must stand at a distance sufficient to provide a clear view of the visible emissions with the sun oriented in the 140° sector of his back. The opacity of emissions will be computed by averaging the results of 24 consecutive opacity observations made at 15-second intervals. For cyclic processes that generate emissions for less than six minutes per cycle, observations will be made only during the operation of the process when visible emissions are generated. A sufficient number of process cycles must be observed to accumulate the required minimum of 24 consecutive opacity readings.

(c) The fugitive opacity limits in Table 2 of this Part are applicable to emissions emanating from building openings.

MAXIMUM ALLOWABLE VISIBLE EMISSION OPACITY LIMITS – Table 2

As listed in Table 2 under the source category 'All other iron and/or steel industry sources' (which includes the annealing and reheat furnaces), the stack and fugitive emissions from the annealing and reheat furnaces shall not exceed 20 percent six-minute average opacity.

(a) Compliance with this requirement shall be determined by the facility owner/operator completing a routine inspection, tuning and calibration of each burner on each furnace.

(b) Records of each inspection, tuning and calibration shall be maintained for five years. The records shall be kept on-site and made available to the Department upon request.

(c) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation or a Method 22 fugitive opacity from the furnaces or furnace buildings.

(d) Upon request, a written report of any visible emission event shall be submitted to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: MONTHLY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR 216.5

Item 20.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: H-00000

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 20.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
NOx RACT – Part 216
ANNEALING AND REHEATING FURNACES

(1)The facility operates a variety of NOx-emitting sources regulated under three separate regulations including Part 212-3, Part 216 and Part 227-2. The facility accepted a federally enforceable emission cap and limited the facility NOx emissions from these sources to less than 90 tons per year before the June 1, 1995 compliance date.

(2)The NOx emissions produced from the iron and steel processes including the natural gas-fired annealing and reheating furnaces were identified in the October 20, 1994 NOx RACT Compliance Plan under Part 216.

(3)The purpose of this condition is to document that the NOx emissions from the annealing and reheating furnaces are exempt from Part 216 NOx RACT based on the following regulation citations:
(a) As per Part 216.5(d), the owner or operator of any facility with federally and state enforceable conditions in certificates to operate which limit the annual potential to emit nitrogen oxides below 100 tons per year by May 31, 1995 is exempt from the RACT analysis and implementation requirements of this section.
(b) As per Part 216.5(e), any facility that is subject to this section after May 31, 1995 will remain subject to these provisions even if the annual potential to emit nitrogen oxides later fall below the applicability threshold.

(4)There are no reporting or recordkeeping requirements for this permit condition.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable Federal Requirement:6 NYCRR Subpart 226-1

Item 21.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: K-00000

Item 21.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

COLD CLEANING DEGREASING
PART 226-1 REQUIREMENTS

GENERAL REQUIREMENTS - Section 226-1.3
Owners or operators conducting solvent cleaning processes must:
(a) store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere;
(b) maintain equipment to minimize leaks and fugitive emissions;
(c) display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs;
(d) keep the degreaser cover closed except when parts are being placed into or being removed from the degreaser, the cover needs to be open in order to add or remove solvent from the degreaser, no solvent is in the degreaser, or manually cleaning parts in a cold cleaning degreaser;
(e) create and maintain a record of solvent consumption for five years. This record must be retained for five years and made available to the department upon request.
(f) not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser; and
(g) if using a cold cleaning degreaser that is subject to paragraph 226-1.4(a)(4) of this Subpart, retain a record of the following three items for five years and provide these records to the department upon request. An invoice, a bill of sale, a certificate covering multiple sales, manufacturers published information or other appropriate documentation acceptable to the department may be used to comply with this requirement:
(i) the name and address of the solvent supplier;
(ii) the type of solvent including the product or vendor identification number; and
(iii) the VOC content of the cleaning solution in

grams per liter (gm/l) or the vapor pressure of the solvent measured in mm Hg at 20°C (68°F) as appropriate to verify compliance

EQUIPMENT SPECIFICATIONS &
CONTROL REQUIREMENTS - Section 226-1.4
The following types of control requirements must be used by an owner or operator conducting solvent cleaning:

(a) 'Cold cleaning degreasing when the internal volume of the machine is greater than two gallons.'

(i) A cover which can be operated easily.

(ii) An internal drainage facility (under cover), if practical.

(iii) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. Remote reservoir degreasers are exempt from this requirement.

(iv) Cleaning solution with a maximum VOC content of 25 grams per liter at 20°C must be used.

OPERATING REQUIREMENTS - Section 226-1.5
The following operating practices are required by a person conducting solvent cleaning:

(a) 'Cold cleaning degreasing.' Clean parts shall be drained at least 15 seconds or until dripping ceases.

There are no reporting requirements for this permit condition.

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. 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 22: Contaminant List
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable State Requirement:ECL 19-0301

Item 22.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 007664-39-3
Name: HYDROGEN FLUORIDE

CAS No: 007664-93-9
Name: SULFURIC ACID

CAS No: 007697-37-2
Name: NITRIC ACID

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

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

Condition 23: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable State Requirement:6 NYCRR 201-1.4

Item 23.1:
(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 24: Emission Unit Definition
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: A-00000
Emission Unit Description:
Emission Unit A-00000 consists of steel grinding and cutting operations that generate particulate emissions. Emissions from the process sources are controlled using particulate control devices. The following emission sources are included in this emission unit:
(1) 00A01 Old Plate to Bar Shop Saw controlled by settling chamber 00A02 that vents to emission point A0057 located in the Howard Avenue Mills building.
(2) 00A03, 00A04, 00A05, 00A06 & 00A07 - Five (5) West End Abrasive Saws controlled by settling chambers 00A23, 00A24, 00A25, 00A26 & 00A27 that vent to emission point A0060 located in the Bar and Finish Storage building.
(3) 00A15 North Fox Abrasive Saw controlled by dust collector 00A16 that vents to emission point A0087 located in Howard Avenue Mills building.
(4) 00A17 South Fox Abrasive Saw controlled by settling chamber 00A18 and then by a dust collector that vents to emission point A0174.
(5) 00A19 Long Bar Saw controlled by settling chamber 00A20 that vents to emission point ABFSH located in the Bar and Finish Storage building.
(6) 00A21 East End Abrasive Saw controlled by settling chamber 00A22 that vents to CBFSH

Building(s): BFS
HAP

Item 24.2:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: B-00000
Emission Unit Description:
Emission Unit B-00000 includes the following emission sources and particulate control equipment:
(1) 00B01 North CM Grinder controlled by settling chamber 00B02 and wet scrubber (Rotocone) 00B03 that vents to emission point B0163
(2) 00B04 South CM Grinder controlled by settling chamber 00B05 and wet scrubber (Rotocone) 00B06 that vents to emission point B0164
(3) 00B10 Abrasive Billet Saw controlled by settling chamber 00B11 that vents to emission point B0164

All emission points are located in the Brigham Road

Plant.

Building(s): BRP

Item 24.3:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: C-00000
Emission Unit Description:
Emission Unit C-00000 includes steel cutting and grinding operations that includes the following emission sources and particulate control equipment:
(1) 00C03 Birdsboro Hot Abrasive Saw controlled by fabric filter 00C04 that vents to emission point C0180
(2) 00C05 Pointer Abrasive Grinder controlled by settling chamber and fabric filter 00C06 that vents to emission point CEP01
(3) 00C07 East End Abrasive Saw controlled by fabric filter 00C08 that vents to emission point CBFSH
(4) CEU01 Hetran Bar Cell Abrasive Saw controlled by dust collector CCD01 that vents to emission point CEP01
(5) CEU02 Hetran Bar Cell Polisher controlled by dust collector CCD02 that vents to emission point CEP02
(6) CEU03 Round Mill Hot Saw controlled by dust collector CCD03 that vents to emission point CEP03

This emission unit has exempt sources per 6NYCRR Part 201-3.2(c)(18) as follows:
(1) 00C11 Coil Shot Blast Operation controlled by fabric filter (00C12) that vents to emission point C0182
(2) 00C13 Multi-Bar Shot Blast Operation controlled by fabric filter (00C14) that vents to emission point C0183

Building(s): BFS
BRP

Item 24.4:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: D-00000
Emission Unit Description:
Emission unit D-00000 includes ten (10) Centerless Grinders (emission sources 00D01 through 00D10), which are located in the Bar Finish & Storage building low bay. The grinders vent to the room, without controls; a roof fan (DBFSL) has been designated as the emission point for these grinders.

Building(s): BFS
WIREMILL

Item 24.5:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: F-00000

Emission Unit Description:
Emission Unit F-00000 includes stainless steel pickling operations, which are conducted in the BFS pickle house. The following emission sources are included in this emission unit:
(1) EP F0154 - vents sulfuric acid pickling tank 00F01, without controls
(2) EP F0156 - vents sulfuric acid/hydrofluoric acid pickling tank 00F03, controlled by scrubber 00F04
(3) EP F0157 - vents nitric acid pickling tank 00F05, without controls
(4) EP F0158 - vents Vicafil TS408 coating tank 00F09, without controls
(5) EP F0181 - vents Degrease Tank 00F07, without controls

Building(s): BFSPICKLE

Item 24.6:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: G-00000
Emission Unit Description:
Emission Unit G-00000 includes two (2) 300 HP natural gas fired emergency stationary internal combustion engines (00G03 & 00G04) subject to 40 CFR 63 Subpart ZZZZ. The installation date for these engines is 1960. The engines vent to emission points G0176 and G0177.

Building(s): HAPANNEAL
WTP

Item 24.7:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: H-00000
Emission Unit Description:
Emission Unit H-00000 includes process furnaces (reheat and annealing) located in the Brigham Road Plant, HAP Annealing Bay, HAP Round Mill and HAP Shape Mill. Some of the furnaces vent via stacks and are referred to as "confined" furnaces. Some of the furnaces vent to the room and ultimately, through nearby roof vents. These furnaces are referred to as "unconfined". The particulate emissions from the furnaces are subject to 6NYCRR Part 216. The NOx emissions from the furnaces are subject to 6NYCRR Part 216.5(d) and (e).
The following process units are included in this emission unit:

(1) 00H01 Rust Furnace (68.5 MMBtu/hr fired by natural gas) that vents to emission point H0178 located in the Brigham Road Plant
(2) 00H02 Olson Furnace (30.05 MMBtu/hr fired by natural

gas) that vents to emission point H0179 located in the Brigham Road Plant
(3) 00H03 GE Roller Hearth Furnace (12.8 MMBtu/hr fired by natural gas) that vents to emission point HANB1 located in the Annealing Bay
(4) 00H04 GE Roller Hearth Furnace (15.45 MMBtu/hr fired by natural gas) that vents to emission point HANB1 located in the Annealing Bay
(5) 00H06 & 00H07 Two (2) Lindberg Furnaces (1 MMBtu/hr each fired by natural gas or propylene) that vent to emission point HANB1 located in the Annealing Bay.
(6) 00H08 & 00H09 Two (2) Lindberg Furnaces (1 MMBtu/hr each fired by natural gas) that vent to emission point HANB1 located in the Annealing Bay
(7) 00H10 Pie Furnace (10 MMBtu/hr fired by natural gas) that vents to emission point HANB1 located in the Annealing Bay
(8) 00H11, 00H12, 00H13, 00H14 Four (4) Round Mill Furnaces (6.3 MMBtu/hr each fired by natural gas) that vent to 8 emission points
(9) 00H15, 00H16, H1502, H1600 Four (4) Shape Mill Furnaces (6.3 MMBtu/hr fired by natural gas) that vents to 4 emission points.
(10) H0017 & H0018 Two (2) Seco Warwick Furnaces (12 MMBtu/hr each fired by natural gas).

Total of 19 furnaces.

Two processes have been defined for this emission unit.
Process H01 consists of the combustion of natural gas, which occurs in all the furnaces in this emission unit.
Process H02 consists of the combustion of propylene, which occasionally occurs in two of the Lindberg Furnaces (00H06 and 00H07).

Building(s): BRP
HAPANNEAL
ROUNDMILL
SHAPEMILL

Item 24.8:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: I-00000
Emission Unit Description:
Emission unit I-00000 consists of storage tanks for virgin and spent chemicals for the pickling operations.

Non-exempt sources are as follows:
(1) 00I01 Nitric Acid 13,000 gallon vertical storage tank located outside the BFS pickle building
(2) 00I02 Sulfuric Acid 13,000 gallon vertical storage tank located outside the BFS pickle building

(3) 00I05 Spent Sulfuric Acid & Hydrofluoric Acid 13,000 gallon vertical storage tank located outside the BFS pickle building

Building(s): BFSPICKLE

Item 24.9:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: J-00000
Emission Unit Description:
Emission unit J-00000 is the facility Wastewater Treatment Plant and includes the following sources:
(1) 00J01 is the south equalization tank
(2) 00J02 is the north equalization tank
(3) 00J03 is a holding tank
(4) 00J04 is a sulfuric acid holding tank

Building(s): WTP

Item 24.10:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: K-00000
Emission Unit Description:
Emission unit K-00000 consists of solvent parts washers that use non-chlorinated solvent and services are done routinely by an outside vender such as Heritage Crystal Clean. The individual parts washers, which are located in different buildings throughout the facility, are exempt from permitting under 6NYCRR 201-3.2(c)(39) due to their small capacities; therefore, there are no specific emission points or sources identified for this emission unit. However, the solvent parts washers are subject to certain requirements under 6NYCRR Part 226-1.

Building(s): BFS
BRP
HAP

Item 24.11:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: L-00000
Emission Unit Description:
Emission Unit L-00000 includes the emissions from a large and small oil quench tank. In the oil quench process, hot charges are cooled to change the chemistry of the steel by dipping them in the oil. The quenched steel units are sent to either the pickling process or to an electric annealing furnace for further processing. The emissions from the oil quench tanks are subject to 6 NYCRR Part 212.

Building(s): HAPANNEAL

Item 24.12:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: M-00000
Emission Unit Description:
Emission Unit M-00000 consists of miscellaneous activities that include exempt sources such as storage tanks, space heaters, boilers less than 10 mmBTU/hr, welding, and other maintenance activities. There are no specific emission points or sources identified for this emission unit.

Condition 25: Renewal deadlines for state facility permits
Effective between the dates of 07/11/2022 and 07/10/2032

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

Item 25.1:
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 26: CLCPA Applicability
Effective between the dates of 07/11/2022 and 07/10/2032

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

Item 26.1:
Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

Condition 27: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

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

Item 27.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 27.2:
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 9
700 Delaware Ave.,
Buffalo, N.Y. 14209

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 28: Air pollution prohibited
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable State Requirement:6 NYCRR 211.1

Item 28.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

Condition 29: Emission Point Definition By Emission Unit
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 29.1:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: A-00000

Emission Point: A0057
Height (ft.): 41 Diameter (in.): 16
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: HAP

Emission Point: A0060
Height (ft.): 44 Diameter (in.): 18
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFS

Emission Point: A0087
Height (ft.): 40 Diameter (in.): 6
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: HAP

Emission Point: A0174
Height (ft.): 40 Diameter (in.): 8
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: HAP

Emission Point: ABFS1
Height (ft.): 53 Diameter (in.): 70
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFS

Emission Point: ABFSH
Height (ft.): 39 Diameter (in.): 12
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFS

Item 29.2:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: B-00000

Emission Point: B0163
Height (ft.): 44 Diameter (in.): 23
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BRP

Emission Point: B0164
Height (ft.): 44 Diameter (in.): 23
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BRP

Item 29.3:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: C-00000

Emission Point: C0180
Height (ft.): 42 Diameter (in.): 18
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BRP

Emission Point: CBFSH
Height (ft.): 53 Diameter (in.): 70
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFS

Item 29.4:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: D-00000

Emission Point: DBFSL
Height (ft.): 41 Diameter (in.): 54
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFS

Item 29.5:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: F-00000

Emission Point: F0154
Height (ft.): 54 Diameter (in.): 36
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFSPICKLE

Emission Point: F0156
Height (ft.): 54 Diameter (in.): 36
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFSPICKLE

Emission Point: F0157
Height (ft.): 54 Diameter (in.): 36
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFSPICKLE

Emission Point: F0158
Height (ft.): 54 Diameter (in.): 36
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFSPICKLE

Emission Point: F0181
Height (ft.): 38 Diameter (in.): 10
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFSPICKLE

Item 29.6:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: G-00000

Emission Point: G0176
Height (ft.): 6 Diameter (in.): 24
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: WTP

Emission Point: G0177
Height (ft.): 6 Diameter (in.): 24
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: HAPANNEAL

Item 29.7:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: H-00000

Emission Point: H0001
Height (ft.): 15 Diameter (in.): 30
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: ROUNDMILL

Emission Point: H0002
Height (ft.): 15 Diameter (in.): 30
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: HAPANNEAL

Emission Point: H0178
Height (ft.): 125 Diameter (in.): 44
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BRP

Emission Point: H0179
Height (ft.): 42 Diameter (in.): 24

NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BRP

Emission Point: HANB1
Height (ft.): 67 Diameter (in.): 48
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: HAPANNEAL

Emission Point: HRMCE
Height (ft.): 60 Length (in.): 24 Width (in.): 24
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: ROUNDMILL

Emission Point: HSMCE
Height (ft.): 60 Length (in.): 1560 Width (in.): 24
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: SHAPEMILL

Item 29.8:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: I-00000

Emission Point: I0001
Height (ft.): 10 Diameter (in.): 3
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFSPICKLE

Emission Point: I0002
Height (ft.): 10 Diameter (in.): 3
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFSPICKLE

Emission Point: I0003
Height (ft.): 10 Diameter (in.): 3
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: BFSPICKLE

Item 29.9:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: L-00000

Emission Point: LANB2
Height (ft.): 3 Diameter (in.): 3
NYTMN (km.): 4711.4 NYTME (km.): 143.2 Building: HAPANNEAL

Condition 30: Process Definition By Emission Unit
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 30.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00000
Process: A01 Source Classification Code: 3-03-009-12
Process Description:
This process includes steel grinding and cutting

operations that generate particulate emissions controlled by particulate control devices.

Emission Source/Control: 00A02 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A08 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A16 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A18 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A20 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A22 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A23 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A24 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A25 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A26 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A27 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00A01 - Process

Emission Source/Control: 00A03 - Process

Emission Source/Control: 00A04 - Process

Emission Source/Control: 00A05 - Process

Emission Source/Control: 00A06 - Process

Emission Source/Control: 00A07 - Process

Emission Source/Control: 00A15 - Process

Emission Source/Control: 00A17 - Process

Emission Source/Control: 00A19 - Process

Emission Source/Control: 00A21 - Process

Item 30.2:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-00000
Process: B01 Source Classification Code: 3-03-009-12
Process Description:
This process includes CM grinders and an abrasive billet saw.

Emission Source/Control: 00B02 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00B03 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 00B05 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00B06 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 00B11 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00B01 - Process

Emission Source/Control: 00B04 - Process

Emission Source/Control: 00B10 - Process

Item 30.3:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-00000
Process: C01 Source Classification Code: 3-03-009-12
Process Description:
This process includes steel cutting and grinding operations that are equipped with fabric filters.

Emission Source/Control: 00C04 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00C06 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00C08 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CCD01 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CCD02 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CCD03 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00C03 - Process

Emission Source/Control: 00C05 - Process

Emission Source/Control: 00C07 - Process

Emission Source/Control: CEU01 - Process

Emission Source/Control: CEU02 - Process

Emission Source/Control: CEU03 - Process

Item 30.4:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: D-00000
Process: D01 Source Classification Code: 3-03-009-12
Process Description:
This process includes the centerless grinders that vent to the room without controls.

Emission Source/Control: 00D01 - Process

Emission Source/Control: 00D02 - Process

Emission Source/Control: 00D03 - Process

Emission Source/Control: 00D04 - Process

Emission Source/Control: 00D05 - Process

Emission Source/Control: 00D06 - Process

Emission Source/Control: 00D07 - Process

Emission Source/Control: 00D08 - Process

Emission Source/Control: 00D09 - Process

Emission Source/Control: 00D10 - Process

Item 30.5:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-00000
Process: DYN Source Classification Code: 4-02-018-99
Process Description:
The Precleaner or 'Degrease' tank is used to prepare the drawn coils after the Vicafil has been applied.

Emission Source/Control: 00F07 - Process

Item 30.6:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-00000
Process: FCL Source Classification Code: 3-03-009-10
Process Description:
This process is for the pickling of steel products in a mixture of sulfuric acid [approximately 12 - 18%], hydrofluoric acid [approximately 1 - 2%], and water. Work loads of approximately 12,000 pounds are immersed in the bath. The pickling bath is identified as emission source 00F03. Sulfuric acid and hydrofluoric acid emissions are vented to a wet scrubber (emission source 00F04) to control emissions. The scrubber exhausts through emission point F0156.

Emission Source/Control: 00F04 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 00F03 - Process

Item 30.7:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-00000
Process: FNA Source Classification Code: 3-03-009-10
Process Description:
This process is for the pickling of steel products in nitric acid (emission source 00F05) in work loads of approximately 12,000 pounds by immersion in a tank containing a solution of approximately 30% nitric acid. Nitric acid emissions are vented without controls through emission point F0157.

Emission Source/Control: 00F05 - Process

Item 30.8:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-00000
Process: FSA Source Classification Code: 3-03-009-10
Process Description:
This process is for the pickling of steel products in

sulfuric acid (emission source 00F01) in work loads of approximately 12,000 pounds by immersion in a bath containing a 20% solution of sulphuric acid heated to a temperature of 180 deg. F. Sulfuric acid emissions are vented without controls through emission point F0154.

Emission Source/Control: 00F01 - Process

Item 30.9:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-00000
Process: FVC Source Classification Code: 4-02-018-99
Process Description:
This process is for coating steel products with Vicafil TS408. Emissions are vented without controls through emission point F0158.

Emission Source/Control: 00F09 - Process

Item 30.10:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: G-00000
Process: G01 Source Classification Code: 1-03-006-02
Process Description:
Process G01 is for the combustion of natural gas in two (2) 300 HP natual gas fired emergency stationary internal combustion engines, emission sources G03 and G04. One engine is located in the wastewater treatment plant and the other engine is located with the annealing furnaces.

Emission Source/Control: 00G03 - Combustion
Design Capacity: 300 horsepower (mechanical)

Emission Source/Control: 00G04 - Combustion
Design Capacity: 300 horsepower (mechanical)

Item 30.11:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: H-00000
Process: H01 Source Classification Code: 3-90-006-89
Process Description:
The process consists of the combustion of natural gas in the annealing and reheating furnaces that are part of this emission unit.

Emission Source/Control: 00H01 - Process
Design Capacity: 68.5 million Btu per hour

Emission Source/Control: 00H02 - Process

Design Capacity: 30 million Btu per hour

Emission Source/Control: 00H03 - Process
Design Capacity: 12.8 million Btu per hour

Emission Source/Control: 00H04 - Process
Design Capacity: 15.45 million Btu per hour

Emission Source/Control: 00H06 - Process
Design Capacity: 1 million Btu per hour

Emission Source/Control: 00H07 - Process
Design Capacity: 1 million Btu per hour

Emission Source/Control: 00H08 - Process
Design Capacity: 1 million Btu per hour

Emission Source/Control: 00H09 - Process
Design Capacity: 1 million Btu per hour

Emission Source/Control: 00H10 - Process
Design Capacity: 10 million Btu per hour

Emission Source/Control: 00H11 - Process
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H12 - Process
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H13 - Process
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H14 - Process
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H15 - Process
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H16 - Process
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: 00H17 - Process
Design Capacity: 12 million Btu per hour

Emission Source/Control: 00H18 - Process
Design Capacity: 12 million Btu per hour

Emission Source/Control: H1502 - Process
Design Capacity: 6.3 million Btu per hour

Emission Source/Control: H1600 - Process
Design Capacity: 6.3 million Btu per hour

Item 30.12:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: H-00000
Process: H02 Source Classification Code: 3-90-007-98
Process Description:
The process consists of the combustion of propylene in two of the Lindberg furnaces, H06 and H07.

Emission Source/Control: 00H06 - Process
Design Capacity: 1 million Btu per hour

Emission Source/Control: 00H07 - Process
Design Capacity: 1 million Btu per hour

Item 30.13:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: I-00000
Process: I01 Source Classification Code: 3-03-009-98
Process Description:
This process includes the three non-exempt chemical storage tanks associated with the pickling process.

Emission Source/Control: 00I01 - Process
Design Capacity: 13,000 gallons

Emission Source/Control: 00I02 - Process
Design Capacity: 13,000 gallons

Emission Source/Control: 00I03 - Process
Design Capacity: 13,000 gallons

Item 30.14:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: J-00000
Process: J01 Source Classification Code: 3-03-009-98
Process Description:
This process includes the oil skimming operations and wastewater equalization tanks.

Emission Source/Control: 00J01 - Process

Emission Source/Control: 00J02 - Process

Emission Source/Control: 00J03 - Process

Emission Source/Control: 00J04 - Process

Item 30.15:

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

Emission Unit: K-00000
Process: K01 Source Classification Code: 3-03-009-98
Process Description:
This process includes the nonchlorinated solvent parts washers located throughout the facility.

Emission Source/Control: KMISC - Process

Item 30.16:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: L-00000
Process: L01 Source Classification Code: 3-03-009-98
Process Description:
This process includes emissions from the large oil quench tank (00L07) and the small oil quench tank (00L08) which are subject to 6NYCRR Part 212.

Emission Source/Control: 00L07 - Process

Emission Source/Control: 00L08 - Process

Item 30.17:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: M-00000
Process: M01 Source Classification Code: 3-03-009-98
Process Description:
This process includes miscellaneous exempt sources such as storage tanks less than 10,000 gallons, space heaters, boilers less than 10 mmBTU/hr, welding, and other maintenance activities. There are no specific emission points or sources identified for this emission unit.

Emission Source/Control: MMISC - Process

Condition 31: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable State Requirement:6 NYCRR 212-3.1

Item 31.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

NOx RACT - Part 212-3
NITRIC ACID PICKILING TANK

(1) The facility operates a variety of NOx-emitting sources regulated under three separate regulations including Part 212-3, Part 216 and Part 227-2. The facility accepted a federally enforceable emission cap and limited the facility NOx emissions from these sources to less than 90 tons per year before the June 1, 1995 compliance date.

(2) The NOx emissions produced from the nitric acid pickling tank (EP F0157) were identified in the October 20, 1994 NOx RACT Compliance Plan under Part 212.10 which has since been re-numbered as 6NYCRR Part 212-3.

(3) The purpose of this condition is to document that the NOx emissions from the nitric acid pickling tank are not subject to the requirements in Part 212-2 based on the following regulation citations:
(a) As per Part 212-1.5(f), facility owners or operators whose process operations emit NOx and meet the applicability requirements of Subpart 212-3 are not subject to the control provisions in Subpart 212-2 for NOx.
(b) As per Part 212-3.1(d), the owner or operator of any facility with federally and state enforceable conditions in a permit to operate that limits its annual potential to emit NOx below the applicability level of 100 tons per year by May 31, 1995 is exempt from the RACT analysis and implementation requirements of this Section.

(c) As per Part 212-3.1(e), any facility that is subject to this section after May 31, 1995 will remain subject to these provisions even if the annual potential to emit NOx later falls below the applicability threshold.

(4) There are no reporting or recordkeeping requirements for this permit condition.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 32: Compliance Demonstration
Effective between the dates of 07/11/2022 and 07/10/2032

Applicable State Requirement:6 NYCRR 212-1.7 (a)

Item 32.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: F-00000
Process: FCL Emission Source: 00F03

Regulated Contaminant(s):
CAS No: 007664-39-3 HYDROGEN FLUORIDE

Item 32.2:
Compliance Demonstration shall include the following monitoring:

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

CAPTURE EFFICIENCY OR FACE VELOCITY
ACROSS HF PICKLING TANK 00F03 & SCRUBBER 00F04

(1) Facility owners and/or operators of a process emission source required by the department to demonstrate compliance with Part 212 may be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to 6 NYCRR Part 202. [212-1.7(a)]

(2) A capture rate of 100% was used in the Part 212 ambient impact evaluation for hydrogen fluoride emissions from hydrofluoric-sulfuric acid pickling tank, 00F03. A capture rate of 100% must be maintained for continued compliance.

(3) Engineering literature from Industrial Hygiene Ventilation Manual, 27th Edition, references that a face velocity of 250 feet per minute or the equivalent 250 cubic feet per minute per square foot of open tank surface area (cfm/sqft) is required to achieve a 100% capture efficiency. In February 2021, the facility demonstrated the minimum flow across the tank surface was 255 acfm/sqft which satisfies the required best engineering ventilation capture rate.

(4) The capture rate was calculated by dividing the measured scrubber (00F04) airflow in cubic feet per minute by the open surface area of the hydrofluoric-sulfuric acid pickling tank in square feet. The inlet and outlet scrubber flowrates were measured at 48,620 acfm and 47,140 acfm, respectively. The internal dimensions of the tank are a length of 37 ft and a width of 5 ft (from drawings) with a surface area equal to 185 sq.ft. The resulting

measured capture rate ranges between 255 and 263 cfm/sqft which satisfies the minimum required rate of 250 cfm/sq.ft.

(5) On a monthly basis, the facility shall confirm the capture rate across the hydrofluoric-sulfuric acid pickling tank results in the minimum required rate of 250 acfm/sqft using a hand-held measurement device. If the capture rate is recorded below 250 acfm/sqft, then inspect the source, initiate corrective action, and restore operation of the scrubber and associated capture system to its normal operation as expeditiously as practicable.

(6) Records shall be maintained to include: (i) a monthly log documenting the scrubber air flow rate and the resulting capture rate across the pickling tank, (ii) the date and time of the observation or measurement, (iii) corrective action taken (if any), and (iv) the cause of any equipment malfunction (if known). The records shall be kept on-site and be made available to the Department upon request.

(7) Upon request, a written report shall be submitted to the Department. Notify the department within the time frame specified in 6NYCRR 201-1.4 of any equipment malfunctions resulting in emissions of air contaminants in excess of any emission standard.

Parameter Monitored: VELOCITY
Lower Permit Limit: 250 feet per minute
Monitoring Frequency: MONTHLY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY