

Facility DEC ID: 9293000047

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2930-00047/02001
Effective Date: 04/07/2016 Expiration Date: 05/25/2025

Permit Issued To: Harbison Walker International Steelcasting Inc
4113 Witmer Rd
NIAGARA FALLS, NY 14305

Contact: DAVID JOHNSON
4111 WITMER RD
NIAGARA FALLS, NY 14305
(716) 343-1850

Facility: IMERYS STEELCASTING USA INC
4113 WITMER RD
Niagara, NY 14305

Contact: DAVID JOHNSON
4111 WITMER RD
NIAGARA FALLS, NY 14305
(716) 278-1609

Description:

Imerys Steelcasting USA, Inc. ((Imerys) (formerly Stollberg, Inc.)) is a manufacturer of mold fluxes for the steel industry. These mold fluxes are primarily made from natural mineral products such as wollastonite, limestone, feldspar as well as lampblack and coke fines. These materials are processed by either dry mixing the raw material powders or wet mixing and spray drying the powders. In order to improve production efficiency and capacity, Imerys has installed a new spray dry system to replace one of two existing spray dry systems. The new spray dry system will have approximately twice the capacity of either existing dryer.

An Air State Facility Permit is required for this facility because Imerys slightly exceeds the emissions limit for one Persistent, Bioaccumulative and Toxic Compound (PBT), specifically Manganese, in Table 1 of Subpart 201-9. Presently, Imerys emits approximately 12 tons per year of particulate matter (PM). Once the new spray dry system is operational, Imerys will emit approximately 12.5 tons per year of PM.

Imerys has in place emission control equipment (dust collectors, bag houses, and wet scrubbers) that exceed 90% efficiency for particulate removal. In particular, this facility is subject to 6 NYCRR Part 212-1.6(a) and 6 NYCRR Part 212-2.4(b).

The dry powder mixing process (DPM) uses plough mixers to blend the raw materials to produce a finished product. Material is typically sent to the plough mixers in charges of up to 6000 lbs and each charge is run individually through a mixing cycle before being discharged to the packaging process.

Emissions from the DPM process are controlled through bag house dust collectors. Emissions

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from powder mixer 1 are controlled by bag house DC002 and emitted through EP002 and emissions from powder mixer 2 are controlled by bag house DC003 and emitted through EP003.

The packaging process (PKG) takes finished product from the DPM process and one tower of the spray dry process (SPR) and allows the material to be filled into either small bags (up to 25 lbs.) or bulk bags (up to 3000 lbs.).

Emissions from the PKG process are controlled by 3 individual dust collectors, with each processing line serviced by a dedicated dust collector. Emissions from powder bagger 1 are controlled through DC004, emissions for powder bagger 2 are controlled through DC005, and emissions from granular bagger 1 are controlled through DC006. All three dust collectors in the PKG process (DC004, DC005 and DC006) are emitted through a common emission point, EP005.

The spray dry process (SPR) takes dry raw materials, mixes them with water, then sends the resulting slurry into a heated spray dryer at high pressure. The resulting finished product is a fine granular material that is sent to a packaging operation.

Exhaust air from the spray dryer goes first through a set of cyclones, which causes the larger particles to lose velocity and drop to the bottom of the cyclone where they are collected and recycled in the spray dry process. The exhaust air with any remaining entrapped particles then goes through a wet scrubber, where the smaller particles are removed through contact with water. The particles removed from the scrubber are collected and recycled in the spray dry process. Emissions from spray dryer 1 are controlled through WS001 and emitted through EP004. Emissions from spray dryer 2 (which will be decommissioned once spray dryer 3 is operational) are controlled through WS003 and emitted through EP007. The new spray dry system, spray dryer 3 will have emissions controlled through WS002 and emitted through EP006.

The Silo Material Handling process (SLO) allows us to transport dry raw materials from tanker trucks into our 4 outdoor storage silos. Each silo has its own dust collection system (SLO8A, SLO8B, SLO8C, SLO8D) to vent the air from the trucks pneumatic transport system. Each silo dust collector will be an individual emissions point (EP08A, EP08B, EP08C, EP08D)

The Dust Collection process (HIV) allows us to use a central HiVac system to collect duct from throughout the plant. The HiVac unit has its own dust filter system and is designated as ESHIV. The cleaned air from the HiVac is discharged through emissions point EPHIV.

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: DAVID S DENK
DIVISION OF ENVIRONMENTAL PERMITS
700 DELAWARE AVE
BUFFALO, NY 14209

Authorized Signature: _____ Date: ____ / ____ / ____

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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DEC GENERAL CONDITIONS

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

Facility Level

- 6 5 Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

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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 renewal application at least 180 days before expiration of permits for both Title V and State Facility Permits.

Item 3.3:

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

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

Item 4.1:

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

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- 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
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Facility: IMERYS STEELCASTING USA INC
4113 WITMER RD
Niagara, NY 14305

Authorized Activity By Standard Industrial Classification Code:
2899 - CHEMICAL PREPARATIONS, NEC
3399 - PRIMARY METAL PRODUCTS, NEC

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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,

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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

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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)

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 9: Visible Emissions Limited
Effective between the dates of 04/07/2016 and 05/25/2025

Applicable Federal Requirement:6 NYCRR 211.2

Item 9.1:

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

Condition 2: Compliance Demonstration
Effective between the dates of 04/07/2016 and 05/25/2025

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

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

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Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 22)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Compliance Demonstration
Effective between the dates of 04/07/2016 and 05/25/2025

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

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

This facility is subject to the 6NYCRR Part 212-2.4(b) particulate limit of 0.05 grains per dry standard cubic foot of exhaust gas. The permittee must follow the manufacturer's recommended maintenance procedures for the fabric filters and the facility's standard operating procedures, which include several qualitative measures, to ensure compliance with the particulate emission standard.

Periodic visible emissions observations of all particulate-emitting emission points will occur weekly during daylight hours, with the results recorded and retained for a minimum of two years. If any visible emissions are identified, corrective action is required. The records will be made available to Department representatives during normal business hours.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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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

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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 4: Contaminant List

Effective between the dates of 04/07/2016 and 05/25/2025

Applicable State Requirement:ECL 19-0301

Item 4.1:

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

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

Condition 5: Malfunctions and start-up/shutdown activities

Effective between the dates of 04/07/2016 and 05/25/2025

Applicable State Requirement:6 NYCRR 201-1.4

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Item 5.1:

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

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

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

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

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

Condition 6: Emission Unit Definition
Effective between the dates of 04/07/2016 and 05/25/2025**Applicable State Requirement:6 NYCRR Subpart 201-5****Item 6.1:**

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

Emission Unit: I-00001

Emission Unit Description:

Emission Unit I-00001 comprises facility air emissions from EP02 (dry raw material mixing), EP03 (dry raw material mixing) and EP05 (finished product packaging) and wet scrubbers EP04 (spray dry process) and EP06 (spray dry process). All emission points are located in building B-001.

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Building(s): B-001

Item 6.2:

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

Emission Unit: I-00002

Emission Unit Description:

Emission Unit I-00002 consists of four silos which handle wolastonite, soda ash, glass powder, and fly ash (specific materials could change based on production needs). Materials are pneumatically loaded into the silos and displaced air is vented through dedicated pulse-jet filters (one installed on each silo) to control particulate emissions. The silos are adjacent to Building B-001 and extend approximately 5 to 6 feet above the building height. See report for additional details.

Item 6.3:

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

Emission Unit: I-00003

Emission Unit Description:

The dust collection process handles dust from various points in the plant and conveys it to the HiVac filtration system.

Condition 7: Renewal deadlines for state facility permits
Effective between the dates of 04/07/2016 and 05/25/2025

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

Item 7.1:

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 8: Compliance Demonstration
Effective between the dates of 04/07/2016 and 05/25/2025

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

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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Division of Air Resources
 NYS Dept. of Environmental Conservation
 Region 9
 270 Michigan Ave.
 Buffalo, NY 14203

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1: Air pollution prohibited
Effective between the dates of 04/07/2016 and 05/25/2025

Applicable State Requirement:6 NYCRR 211.1

Item 1.1:

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

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

Condition 10: Emission Point Definition By Emission Unit
Effective between the dates of 04/07/2016 and 05/25/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 10.1:

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

Emission Unit: I-00001

Emission Point: EP002

Height (ft.): 70 Diameter (in.): 10
 NYTMN (km.): 4782.489 NYTME (km.): 171.973 Building: B-001

Emission Point: EP003

Height (ft.): 70 Diameter (in.): 10
 NYTMN (km.): 4782.489 NYTME (km.): 171.973 Building: B-001

Emission Point: EP004

Height (ft.): 70 Diameter (in.): 31
 NYTMN (km.): 4782.489 NYTME (km.): 171.973 Building: B-001

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Emission Point: EP005
 Height (ft.): 70 Diameter (in.): 44
 NYTMN (km.): 4782.489 NYTME (km.): 171.973 Building: B-001

Emission Point: EP006
 Height (ft.): 70 Diameter (in.): 31
 NYTMN (km.): 4782.489 NYTME (km.): 171.973 Building: B-001

Item 10.2:

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

Emission Unit: I-00002

Emission Point: EP08A
 Height (ft.): 67 Length (in.): Width (in.):
 NYTMN (km.): 4782.489 NYTME (km.): 171.973

Emission Point: EP08B
 Height (ft.): 66 Length (in.): Width (in.):
 NYTMN (km.): 4782.489 NYTME (km.): 171.973

Emission Point: EP08C
 Height (ft.): 67 Length (in.): Width (in.):
 NYTMN (km.): 4782.489 NYTME (km.): 171.973

Emission Point: EP08D
 Height (ft.): 66 Length (in.): Width (in.):
 NYTMN (km.): 4782.489 NYTME (km.): 171.973

Item 10.3:

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

Emission Unit: I-00003

Emission Point: EPHIV
 Height (ft.): 25 Length (in.): Width (in.):
 NYTMN (km.): 4782.489 NYTME (km.): 171.973 Building: B-001

Condition 11: Process Definition By Emission Unit

Effective between the dates of 04/07/2016 and 05/25/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 11.1:

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

Emission Unit: I-00001

Process: DPM

Process Description:

The dry powder mixing process (DPM) uses plough mixers to blend the raw materials to produce a finished product. Material is typically sent to the plough mixers in charges

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of up to 6000 lbs and each charge is run individually through a mixing cycle before being discharged to the packaging process.

Emissions from the DPM process are controlled through bag house dust collectors. Emissions from powder mixer 1 are controlled by bag house DC002 and emitted through EP002 and emissions from powder mixer 2 are controlled by bag house DC003 and emitted through EP003.

Emission Source/Control: DC002 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: DC003 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: ESC01 - Process

Item 11.2:

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

Emission Unit: I-00001

Process: PKG

Process Description:

The packaging process (PKG) takes finished product from the DPM process and one tower of the spray dry process (SPR) and allows the material to be filled into either small bags (up to 25 lbs) or bulk bags (up to 3000 lbs).

Emissions from the PKG process are controlled by 3 individual dust collectors with each processing line serviced by a dedicated dust collector. Emissions from powder bagger 1 are controlled through DC004, emissions from powder bagger 2 are controlled through DC005 and emissions from granular bagger 1 are controlled through DC006. All three dust collectors in the PKG process (DC004, DC005 and DC006) are emitted through a common emission point, EP005.

Emission Source/Control: DC004 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: DC005 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: DC006 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: ESC01 - Process

Item 11.3:

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

Emission Unit: I-00001

Process: SPR

Process Description:

The spray dry process (SPR) takes dry raw materials, mixes them with water, then sends the resulting slurry into a heated spray dryer at high pressure. The resulting finished product is a fine granular material that is sent to a packaging operation.

Exhaust air from the spray dryer goes first through a set of cyclones, which causes the larger particles to lose velocity and drop to the bottom of the cyclone where they are collected and recycled in the spray dry process. The exhaust air with any remaining entrapped particles then goes through a wet scrubber, where the smaller particles are removed through contact with water. The particles removed from the scrubber are collected and recycled in the spray dry process. Emissions from spray dryer 1 are controlled through WS001 and emitted through EP004. Emissions from spray dryer 2 (which will be decommissioned once spray dryer 3 is operational) are controlled through WS003 and emitted through EP007. The new spray dry system, spray dryer 3 will have emissions controlled through WS002 and emitted through EP006.

Emission Source/Control: WS001 - Control
Control Type: WET SCRUBBER

Emission Source/Control: WS002 - Control
Control Type: WET SCRUBBER

Emission Source/Control: ESC01 - Process

Item 11.4:

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

Emission Unit: I-00002

Process: SLO

Process Description:

The silo material handling process (SLO) receives incoming raw materials via tanker truck. Powdered materials are pneumatically off-loaded with displaced air vented through filters to control particulate emissions.

Emission Source/Control: SLO8A - Control
Control Type: FABRIC FILTER

Emission Source/Control: SLO8B - Control
Control Type: FABRIC FILTER

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Emission Source/Control: SLO8C - Control
Control Type: FABRIC FILTER

Emission Source/Control: SLO8D - Control
Control Type: FABRIC FILTER

Emission Source/Control: UNLOA - Process

Item 11.5:

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

Emission Unit: I-00003

Process: HIV

Process Description:

The dust collection process handles dust from various points in the plant and conveys it to the HiVac filtration system.

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

Emission Source/Control: CONVY - Process

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