New York State Department of Environmental Conservation
Facility DEC ID: 9562800005

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-5628-00005/00035
Mod 0 Effective Date: 12/07/2000 Expiration Date: No expiration date.

Mod 1 Effective Date: 05/16/2002 Expiration Date: No expiration date.

Mod 2 Effective Date: 04/24/2006 Expiration Date: No expiration date.

Permit Issued To: MARKIN TUBING LP
PO BOX 242
WYOMING, NY 14591-0242

Contact: KEITH GIERMAN
MARKIN TUBING LP
PEARL CREEK ROAD
WYOMING, NY 14591
(585) 495-6211

Facility: MARKIN TUBING
PEARL CREEK RD
WYOMING, NY 14591

Contact: KEITH GIERMAN
MARKIN TUBING LP
PEARL CREEK ROAD
WYOMING, NY 14591
(585) 495-6211

Description:
Markin Tubing, LP, (Markin) manufacturers steel tubing for various commercial applications. Steel strips are unrolled and fed through a stoddard solvent bath for degreasing prior to welding and annealing. The formed tube then proceeds through various coating operations, based upon product type. Markin has a total of eight tube mill production lines: two are copper coating lines, three are plain mills and three are galfan/paint coating lines.

There are currently two permitted and operating painting lines. This permit adds a third line and a thermal oxidizer to destroy VOC emissions while complying with the Part 228 control and destruction efficiency requirement of 81%. This permit also removes Process CU2 (Emission Unit GALCU) due to the conversion of mill 8 to Galfan coating.

Process description: a surface coating is applied to the tubing product after the galfan alloy application.

The surface coating is applied utilizing a dipping process within an enclosed paint booth. The tube then enters the curing step. Two lines have induction heated curing, while the other has a furnace heated curing process. All emissions from both the paint booths (lines 2, 7 & 8) and the induction heated curing process (lines 7 & 8) go to the thermal oxidizer and exit a single emission point (EP 00058). The only other emission point (EP 00057), associated with 1PAINT, is combustion emissions from the furnace associated with line 2 curing process. In addition, periodic quality control checks are performed using a table with an overhead hood that is placed adjacent to the paint booths. There is one table for each of the three lines. This process uses methyl ethyl ketone. All emissions from these processes are emitted to the thermal oxidizer. Under 6nycrr 201-3.2(c)(40), this emission source is an "exempt" activity.

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: STEVEN J DOLESKI
DIVISION OF ENVIRONMENTAL PERMITS
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

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 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 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.

New York State Department of Environmental Conservation
Facility DEC ID: 9562800005

LIST OF CONDITIONS

DEC GENERAL CONDITIONS
General Provisions
Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and Determinations
Applications for Permit Renewals and Modifications
Applications for Permit Renewals and Modifications
Permit Modifications, Suspensions and Revocations by the Department
Permit Modifications, Suspensions, and Revocations by the Department
Facility Level
Submission of Applications 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 1-1: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 1-1.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 1-1.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 1-1.3:
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual

transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 1

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.

Item 3.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Condition 1-2: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 1-2.1:
The Department reserves the right 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.

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Expired by Mod No: 1

Item 4.1:
The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

a) the scope of the permitted activity described in the application is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
c) new material information is discovered; or
d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

****** Facility Level ******

Condition 1-3: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 1-3.1:
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 14203-2999
(716) 851-7165

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 SUBOFFICE
Applicable State Requirement: 6NYCRR 621.5(a)

Expired by Mod No: 1

Item 5.1:
Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Sub-office
Division of Environmental Permits
128 South Street
Olean, NY 14760-3632
(716) 372-0645

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: MARKIN TUBING LP
PO BOX 242
WYOMING, NY 14591-0242

Facility: MARKIN TUBING
PEARL CREEK RD
WYOMING, NY 14591

Authorized Activity By Standard Industrial Classification Code:
3317 - STEEL PIPE AND TUBES

Mod 0 Permit Effective Date: 12/07/2000 Permit Expiration Date: No expiration date.

Mod 1 Permit Effective Date: 05/16/2002 Permit Expiration Date: No expiration date.

Mod 2 Permit Effective Date: 04/24/2006 Permit Expiration Date: No expiration date.

LIST OF CONDITIONS

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EU=1-GALCU,Proc=GAL
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28 6NYCRR 228.4: opacity - <20%

EU=1-PAINT,EP=00057

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FEDERALLY ENFORCEABLE CONDITIONS
****** 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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner and/or operator notified the Department within two working days after the event

occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item F: **Recycling and Salvage - 6NYCRR Part 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 G: **Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 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 H: **Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 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 I: **Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 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 J: **Required Emission Tests - 6 NYCRR Part 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 6NYCRR Part 202-1.

Item K: **Visible Emissions Limited - 6 NYCRR Part 211.3**
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.

Item L: **Open Fires - 6 NYCRR Part 215**
No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Item M: **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 N: **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 17: **Handling, storage, and disposal of volatile organic compounds**
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 17.1:
No owner or operator of a facility subject to 6NYCRR Part 228 shall:

(a) use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup, or coating removal;
(b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup, or coating removal;
(c) use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere;
(d) use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance , or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate; or
(e) use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

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

Condition 19: Compliance Demonstration
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

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

Emission Unit: 1-1WELD
Process: WLD

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

Item 19.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

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 20: Compliance Demonstration
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

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

Emission Unit: 1-ANNEL
Process: ANL

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

Item 20.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

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 21: Compliance Demonstration
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.3(a)

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

Emission Unit: 1-COPPR
Process: CU1

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

Item 21.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
1.) Sulfuric acid and copper sulfate mist from this emission unit are assigned an environmental rating of B. A scrubber is used to reduce emissions. Therefore, the

scrubber shall reduce emissions by at least 98% (allow 2% to be emitted) at emission point 0055 and shall be always be used whenever these processes are operated.

2.) This source shall be emission tested upon written request from the department.

Upper Permit Limit: 2 percent
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-1: Compliance Demonstration
Effective between the dates of 04/24/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 2-1.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-GALCU
Process: GAL

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

Item 2-1.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of 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: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 28: opacity - <20%
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 28.1:
This Condition applies to Emission Unit: 1-PAINT

Item 28.2:
The average opacity of emissions to the outdoor atmosphere shall not equal or exceed 20 percent for any consecutive six-minute period.

Condition 2-2: Compliance Demonstration
Effective between the dates of 04/24/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(g)

Item 2-2.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT Emission Point: 00057

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 2-2.2:
Compliance Demonstration shall include the following monitoring:

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

1.) The paint drying furnace for line 2 shall not be operated below 1400 degrees F. during tube processing at any time.

2.) The facility shall monitor the temperature in the paint drying furnace hourly, using existing temperature sensing devices and record the temperature at each furnace location in a log. If temperature drops below 1400 degrees at any time during the hour, corrective measures shall taken and the cause of the problem and corrective measures taken also recorded in the log. Each such incident shall also be reported to the department within 3

days of occurrence.

3.) The log shall be kept on site and made available to the department upon request during normal business hours.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1400 degrees Fahrenheit
Monitoring Frequency: HOURLY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-3: Compliance Demonstration
Effective between the dates of 04/24/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(b)

Item 2-3.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT Emission Point: 00058

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 2-3.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

1.) The thermal oxidizer shall achieve at least 90% VOC destruction efficiency.

2.) The thermal oxidizer shall be stack tested to determine destruction efficiency. Destruction efficiency shall be determined by testing the VOC inlet and outlet loading and shall be computed by the following:

Destruction efficiency (%) = (inlet loading (lb/hr) - outlet loading (lb/hr)) / inlet loading (lb/hr).

3.) The construction and operation of the thermal oxidizer shall be commence within 60 days of start up of the new surface coating line.

4.) The facility shall notify the Department in writing

at 270 Michigan Avenue, Buffalo upon start up of the surface coating line.

5.) Testing of the thermal oxidizer shall be completed upon reaching maximum production of the surface coating lines but no later than 90 days of commencement of operation of the thermal oxidizer.

6.) A stack test protocol shall be submitted for review and approval 30 days prior to stack testing.

5.) The stack test report shall be submitted to the Department for review and approval within 60 days of testing.

Lower Permit Limit: 90 percent
Reference Test Method: EPA Method 25A or equivalent
Monitoring Frequency: SINGLE OCCURRENCE
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 2-4: Compliance Demonstration
Effective between the dates of 04/24/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(g)

Item 2-4.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAINT Emission Point: 00058

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 2-4.2:
Compliance Demonstration shall include the following monitoring:

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

1.) The thermal oxidizer shall be operated to maintain minimum temperature of 1500 degrees F and shall be operated at all times that tubing surface coating lines are in operation.

2.) The temperature at the outlet of the thermal oxidizer

combustion chamber shall be measured every 15 minutes and the temperature recorded. A one hour average temperature shall be computed and stored stored. These records shall be kept on site and made available to the department upon request during normal business hours.

3.) In the event the temperature drops below 1500 degrees F an alarm shall be sounded and corrective measures shall be taken. The event shall be recorder manually in a log kept near the thermal oxidizer. The log shall contain the time and duration the temperature was below 1500 degrees, the temperatures during that time period and the action taken to correct the problem.

4.) All deviations as recorded in item 3 above shall be reported to the department in writing at 270 Michigan Avenue within 30 days of the ending of each calendar quarter.

4.) The temperature monitoring device shall be calibrated annually and must be accurate within plus or minus 0.75 percent of temperature measured in degrees Celsius or plus or minus 2.5 degrees Celsius, whichever is greater.

7.) Records of monitoring and calibrations shall be kept on site for a period of 5 years and made available for inspection by the department during normal business hours.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1500 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 31: General requirements
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 226.2

Item 31.1:
This Condition applies to Emission Unit: 1-STODD

Item 31.2:
No person shall conduct solvent metal cleaning unless:

(1) Solvent is stored in covered containers and waste solvent is transferred or disposed of in such a manner that less than 20 percent of the waste solvent, by weight, can evaporate into the atmosphere;

(2) Equipment used in solvent metal cleaning is maintained to minimize leaks and fugitive emissions;

(3) Equipment used in solvent metal cleaning displays a conspicuous summary of proper operating procedures consistent with minimizing emissions of volatile organic compounds; and

(4) Equipment covers are closed when the solvent metal cleaning unit is not in service.

(5) A record of solvent consumption shall be maintained for each year and made available to the commissioner or his representative upon request.

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: **Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 201-1.10(a)**
Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1) , and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Item B: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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 1-3: Contaminant List
Effective between the dates of 05/16/2002 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 1-3.1:
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

CAS No: 0NY998-00-0
Name: VOC

Condition 2-5: Unavoidable noncompliance and violations
Effective between the dates of 04/24/2006 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 2-5.1:
At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such

malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 34: Emission Unit Definition
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 34.1(From Mod 2):
The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-1WELD
Emission Unit Description:
ELECTRIC RESISTANCE WELDING STATIONS EXIST AT FOUR (4) OF EIGHT (8) PRODUCTION MILLS AND INDUCTION WELDING STATIONS EXIST AT FOUR (4) OF EIGHT (8) PRODUCTION MILLS. THE WELDING STATIONS HAVE POWER EXHAUST FANS TO VENTILATE FUMES TO ATMOSPHERE THROUGH THE ROOF. AUTOMATED WELDING I S CONTINUOUSLY PERFORMED, FORMING THE TUBE SHAPE FROM THE METAL STRIP FEED. FUMES CONSIST OF IRON AND MANGANESE PARTICULATES.

Building(s): 1B

Item 34.2(From Mod 2):

The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-ANNEL
Emission Unit Description:
ANNEALING STATIONS EXIST AT THE EIGHT (8) PRODUCTION MILLS. EACH ANNEALING STATION HAS ONE (1) POWER EXHAUST FAN TO VENTILATE FUMES TO ATMOSPHERE THROUGH THE ROOF. AUTOMATED ANNEALING IS PERFORMED IMMEDIATELY AFTER WELDING. THE PIPE PRODUCT IS HEAT-TREATE D FOLLOWED BY COLD NITROGEN QUENCHING. PROCESS EMISSIONS CONSIST OF NITROGEN AND PARTICULATES.

Building(s): 1B

Item 34.3(From Mod 2):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-COPPR
Emission Unit Description:
COPPER ELECTROPLATING IS PERFORMED USING A SERIES OF ENCLOSED PLATING AND RINSING TANKS UNDER SLIGHT NEGATIVE PRESSURE DUE TO A SCRUBBER FAN (EP00055). TWO (2) COPPER ELECTROPLATING SYSTEMS COMPRISE THIS EMISSION UNIT. PIPE PRODUCT IS CONTINUOUSLY RECEIVE D FROM ANEALING AND ENTERS THE ELECTROPLATING PROCESS TANKS IN THE FOLLOWING ORDER: 1)SULFURIC ACID (HIGH CONCENTRATION); 2)SULFURIC ACID (LOWER CONCENTRATION); 3)WATER RINSE; 4)COPPER SULFATE; 5) FINAL WATER RINSE. THE TANKS OPERATE UNDER STANDARD TEMPER ATURE AND PRESSURE (68 DEG F, 1ATM). FUMES ARE TREATED USING A PACKED-BED SCRUBBER SYSTEM AT APPROXIMATELY 800 CFM. BASED ON STACK TESTS PERFORMED ON GEOMETRICALLY SIMILAR SYSTEMS, SULFURIC ACID AND COPPER SULFATE EMISSIONS CONCENTRATIONS PRIOR TO SCRUBBING ARE 900 PPM AND 100 PPM, RESPECTIVELY.

Building(s): 1B

Item 34.4(From Mod 2):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-GALCU
Emission Unit Description:
GALFAN COATING IS PERFORMED USING A SERIES

OF ENCLOSED PREPARATION TANKS UNDER SLIGHTLY NEGATIVE PRESSURE DUE TO A SCRUBBER FAN (EP0035A). A CONTINGENCY SCRUBBER HAS ALSO BEEN INSTALLED (EP0035B). PIPE PRODUCT IS CONTINUOUSLY RECEIVED FROM ANNEALING AND E NTERS THE GALFAN PREPARATION TANKS IN THE FOLLOWING ORDER: 1)ALKALINE SCRUB; 2)WATER RINSE; 3)ELECTRO ACID (HYDROCHLORIC ACID); 4)WATER RINSE; 5)ELECTRO FLUX (ZINC CHLORIDE); 6)GALFAN POT; 7)WATER QUENCH; AND 8)PAINT PREP(PHOSPHORIC ACID). THE TANKS OPERATE UNDER STANDARD TEMPERATURE AND PRESSURE (68 DEG F, 1ATM). GALFAN COATING IS APPLIED BY PASSING THE PREPARED PIPE PRODUCT THROUGH THE GALFAN MOLTEN ALLOY POT. THE POT SITS IN A FIRE BRICK ENCLOSURE AND IS HEATED USING NATURAL GAS IN ORDER TO MELT THE RAW GALFAN BARS (APPROXIMATELY 95% ZINC AND 5% ALUMINUM). EMISSIONS ARE TREATED BY A PACKED-BED SCRUBBER SYSTEM OPERATION AT APPROXIMATELY 800 CFM. ONLY ONE SCRUBBER IS ON-LINE DURING OPERATION.

Building(s): 1B

Item 34.5(From Mod 2):
The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-PAINT

Emission Unit Description:

THERE ARE CURRENTLY TWO PERMITTED AND OPERATING PAINTING LINES. THIS PERMIT ADDS A THIRD LINE. PROCESS DESCRIPTION: A SURFACE COATING IS APPLIED TO THE TUBING PRODUCT AFTER THE GALFAN ALLOY APPLICATION. THE SURFACE COATING IS APPLIED UTILIZING A DIPPING PROCESS WITHIN AN ENCLOSED PAINT BOOTH. THE TUBE THEN ENTERS THE CURING STEP. TWO LINES HAVE INDUCTION HEATED CURING, WHILE THE OTHER HAS A FURNACE HEATED CURING PROCESS. ALL EMISSIONS FROM BOTH THE PAINT BOOTHS (LINES 2,7&8) AND THE INDUCTION HEATED CURING PROCESS (LINES 7 & 8) GO TO THE THERMAL OXIDIZER AND EXIT A SINGLE EMISSION POINT (EP 00058). THE ONLY OTHER EMISSION POINT (EP 00057), ASSOCIATED WITH 1PAINT, IS COMBUSTION EMISSIONS FROM

THE FURNACE ASSOCIATED WITH LINE 2 CURING PROCESS. IN ADDITION, PERIODIC QUALITY CONTROL CHECKS ARE PERFORMED USING A TABLE WITH AN OVERHEAD HOOD THAT IS PLACED ADJACENT TO THE PAINT BOOTHS. THERE IS ONE TABLE FOR EACH OF THE THREE LINES. THIS PROCESS USES METHYL ETHYL KETONE. ALL EMISSIONS FROM TH ESE PROCESSES ARE EMITTED TO THE THERMAL OXIDIZER. UNDER 6NYCRR 201-3.2(C)(40), THIS EMISSION SOURCE IS AND "EXEMPT" ACTIVITY.

Building(s): 1B

Item 34.6(From Mod 2):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-STODD
Emission Unit Description:
TOTAL OF SEVEN (7) STODDARD SOLVENT DIP TANKS FOR VIRGIN METAL PRODUCT PRIOR TO MILLING OPERATIONS. ONE TANK PER LINE. HAMIKLEER LUBRICANT IS USED DURING MILLING OPERATIONS AT VARIOUS LOCATIONS.

Building(s): 1B

Condition 36: Air pollution prohibited
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 36.1:
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 37: Emission Point Definition By Emission Unit
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 37.1(From Mod 2):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-1WELD

Emission Point: 00013
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00014
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00015
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00018
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Item 37.2(From Mod 2):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-ANNEL

Emission Point: 00016
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00017
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00019
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00020
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00021
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00022
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00023
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Item 37.3(From Mod 2):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-COPPR

Emission Point: 00055
Height (ft.): 34 Length (in.): 14 Width (in.): 11
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Item 37.4(From Mod 2):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-GALCU

Emission Point: 00064
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 0035A
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 0035B
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Item 37.5(From Mod 2):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-PAINT

Emission Point: 00057
Height (ft.): 27 Diameter (in.): 12
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Emission Point: 00058
Height (ft.): 30 Diameter (in.): 20
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Item 37.6(From Mod 2):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-STODD

Emission Point: 00024
Height (ft.): 24 Diameter (in.): 48
NYTMN (km.): 4748.3 NYTME (km.): 251. Building: 1B

Emission Point: 00026
Height (ft.): 24 Diameter (in.): 48
NYTMN (km.): 4748.3 NYTME (km.): 251. Building: 1B

Emission Point: 00062
Height (ft.): 970 Diameter (in.): 6
NYTMN (km.): 4748.3 NYTME (km.): 253. Building: 1B

Condition 38: Process Definition By Emission Unit
Effective between the dates of 12/07/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 38.1(From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-1WELD
Process: WLD Source Classification Code: 3-09-005-00
Process Description:
ELECTRIC RESISTANCE WELDING STATIONS EXIST AT THE FOUR (4) PRODUCTION MILLS AND ONE INDUCTION WELDING STATION EXISTS AT FOUR (4) PRODUCTION MILLS. THE WELDING STATIONS HAVE POWER EXHAUST FANS TO VENTILATE FUMES TO ATMOSPHERE THROUGH THE ROOF. AUTOMATED WELDING I S CONTINUOUSLY PERFORMED, FORMING THE TUBE SHAPE FROM THE METAL STRIP FEED. FUMES CONSIST OF IRON AND MANGANESE PARTICULATES.

Emission Source/Control: 0001C - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0002C - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0003C - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0004C - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0005C - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0006C - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0007C - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0008C - Process
Design Capacity: 1,400 pounds per hour

Item 38.2(From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-ANNEL
Process: ANL Source Classification Code: 3-03-009-34
Process Description:
ANNEALING STATIONS EXIST AT THE EIGHT (8) PRODUCTION MILLS. EACH ANNEALING STATION HAS ONE (1) POWER EXHAUST FAN TO VENTILATE FUMES TO ATMOSPHERE THROUGH THE ROOF. AUTOMATED ANNEALING IS PERFORMED IMMEDIATELY AFTER WELDING. THE PIPE PRODUCT IS HEAT-TREATE D FOLLOWED BY COLD NITROGEN QUENCHING. PROCESS EMISSIONS CONSIST OF NITROGEN.

Emission Source/Control: 0002D - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0003D - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0004D - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0005D - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0006D - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0007D - Process
Design Capacity: 1,400 pounds per hour

Emission Source/Control: 0008D - Process
Design Capacity: 1,400 pounds per hour

Item 38.3(From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-COPPR
Process: CU1 Source Classification Code: 3-09-010-04
Process Description:
COPPER ELECTROPLATING IS PERFORMED USING A SERIES OF ENCLOSED PLATING AND RINSING TANKS UNDER SLIGHT NEGATIVE PRESSURE DUE TO A SCRUBBER FAN (EP00055). TWO (2) COPPER ELECTROPLATING SYSTEMS COMPRISE THIS EMISSION UNIT. PIPE PRODUCT IS CONTINUOUSLY RECEIVE D FROM ANEALING AND ENTERS THE ELECTROPLATING PROCESS TANKS IN THE FOLLOWING ORDER: 1)SULFURIC ACID (HIGH CONCENTRATION); 2)SULFURIC ACID (LOWER CONCENTRATION); 3)WATER RINSE; 4)COPPER SULFATE; 5) FINAL WATER RINSE. THE TANKS OPERATE UNDER STANDARD TEMPER ATURE AND PRESSURE (68 DEG F, 1ATM). FUMES ARE TREATED USING A PACKED-BED SCRUBBER SYSTEM AT APPROXIMATELY 800 CFM. BASED ON STACK TESTS PERFORMED ON GEOMETRICALLY SIMILAR SYSTEMS, SULFURIC ACID AND COPPER SULFATE EMISSIONS CONCENTRATIONS PRIOR TO SCRUBBI NG ARE 900 PPM AND 100 PPM, RESPECTIVELY.

Emission Source/Control: 0003F - Control
Control Type: FLUID BED DRY SCRUBBER

Emission Source/Control: 0003E - Process
Design Capacity: 9,000 feet per hour

Emission Source/Control: 0004E - Process
Design Capacity: 9,000 feet per hour

Item 38.4(From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-GALCU
Process: GAL Source Classification Code: 3-04-008-05

Process Description:

GALFAN COATING IS PERFORMED USING A SERIES OF ENCLOSED PREPARATION TANKS UNDER SLIGHTLY NEGATIVE PRESSURE DUE TO A SCRUBBER FAN (EP0035A). A CONTINGENCY SCRUBBER HAS ALSO BEEN INSTALLED (EP0035B). EMISSIONS FROM PREPARATION TANKS GO TO THE SCRUBBER WHICH IS PART OF PROCESS CU2. PIPE PRODUCT IS CONTINUOUSLY RECEIVED FROM ANNEALING AND E NTERS THE GALFAN PREPARATION TANKS IN THE FOLLOWING ORDER: 1)ALKALINE SCRUB; 2)WATER RINSE; 3)ELECTRO ACID (HYDROCHLORIC ACID); 4)WATER RINSE; 5)ELECTRO FLUX (ZINC CHLORIDE); 6)GALFAN POT; 7)WATER QUENCH; AND 8)PAINT PREP (PHOSPHORIC ACID). THE TANKS OPERATE UNDER STAND ARD TEMPERATURE AND PRESSURE (68 DEG F, 1ATM). GALFAN COATING IS APPLIED BY PASSING THE PREPARED PIPE PRODUCT THROUGH THE GALFAN MOLTEN ALLOY POT. THE POT SITS IN A FIRE BRICK ENCLOSURE AND IS HEATED USING NATURAL GAS IN ORDER TO MELT THE RAW GALFAN BARS (APPROXIMATELY 95% ZINC AND 5% ALUMINUM). FUMES ARE TREATED USING A PACKED-BED SCRUBBER SYSTEM AT APPROXIMATELY 800 CFM. EMISSIONS ARE TREATED BY A PACKED-BED SCRUBBER SYSTEM OPERATION AT APPROXIMATELY 800 CFM. ONLY ONE SCRUBBER IS ON-LINE DURING OPERATIO N.

Emission Source/Control: 0007E - Control
Control Type: FLUID BED DRY SCRUBBER

Emission Source/Control: 0007F - Process
Design Capacity: 6,800 feet per hour

Item 38.5(From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-PAINT
Process: FLO Source Classification Code: 4-02-001-01
Process Description:

A SURFACE COATING IS APPLIED TO THE TUBING PRODUCT AFTER THE GALFAN ALLOY APPLICATION. THE SURFACE COATING IS APPLIED UTILIZING A DIPPING PROCESS WITHIN AN ENCLOSED PAINT BOOTH. THE TUBE THEN ENTERS THE CURING

STEP. TWO LINES HAVE INDUCTION HEATED CURI NG, WHILE THE OTHER HAS A FURNACE HEATED CURING PROCESS. ALL EMISSIONS FROM BOTH THE PAINT BOOTHS (LINES 2, 7 & 8) AND THE INDUCTION HEATED CURING PROCESS (LINES 7 & 8) GO TO THE THERMAL OXIDIZER AND EXIT A SINGLE EMISSIONS POINT (EP 00058). THE ONLY OTHER EMISSION POINT (EP 00057), ASSOCIATED WITH 1PAINT, IS COMBUSTION EMISSIONS FROM THE FURNACE ASSOCIATED WITH LINE 2 CURING PROCESS. IN ADDITION, PERIODIC QUALITY CONTROL CHECKS ARE PERFORMED USING A TABLE WITH AN OVERHEAD HOOD THAT IS PLACED ADJACENT TO THE PAINT BOOTHS. THERE IS ONE TABLE FOR EACH OF THE THREE LINES. THIS PROCESS USES METHYL ETHYL KETONE. ALL EMISSIONS FROM THESE PROCESSES ARE EMITTED TO THE THERMAL OXIDIZER. UNDER 6NYCRR 201-3.2(C)(40), THIS EMISSION SOURCE IS AND "EXEMPT" ACTIVITY.

Emission Source/Control: 0009K - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 0007H - Process

Emission Source/Control: 0007J - Process

Emission Source/Control: 0008G - Process

Emission Source/Control: 0008H - Process

Emission Source/Control: 0008J - Process

Emission Source/Control: 0009G - Process

Emission Source/Control: 0009H - Process

Emission Source/Control: 0009J - Process

Item 38.6(From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-STODD
Process: LUB Source Classification Code: 3-09-030-07
Process Description:

THE HAMIKLEER SOLUTION IS USED TO LUBRICATE THE TUBING PRODUCT AFTER IT HAS BEEN WELDED. THE TUBING PASSES THROUGH A HAMILKEER AND WATER BATH (50% CONCENTRATION). THE VOC COMPONENTS OF HAMIKLEER CAN ESCAPE TO THE INTERIOR OF THE FACILITY AND EXIT THE FAC ILITY THROUGH TWO OVERHEAD POWER EXHAUST FANS.

Emission Source/Control: 0001B - Process

Emission Source/Control: 0002B - Process

Emission Source/Control: 0003B - Process

Emission Source/Control: 0004B - Process

Emission Source/Control: 0005B - Process

Emission Source/Control: 0006B - Process

Emission Source/Control: 0007B - Process

Emission Source/Control: 0008B - Process

Item 38.7(From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-STODD
Process: SOL Source Classification Code: 4-01-002-01
Process Description:

STODDARD SOLVENT IS USED TO CLEAN VIRGIN METAL PRODUCT VIA FEEDING METAL STRIPS THROUGH SOLVENT TANKS. TOTAL OF SEVEN (7) TANKS: ONE (1) TANK FOR EACH MANUFACTURING LINE. THE VOC COMPONENTS OF THE STODDARD SOLVENT CAN ESCAPE TO THE INTERIOR OF THE FACILIT Y AND EXIT THROUGH TWO OVERHEAD POWER EXHAUST FANS.

Emission Source/Control: 0001A - Process

Emission Source/Control: 0002A - Process

Emission Source/Control: 0003A - Process

Emission Source/Control: 0004A - Process

Emission Source/Control: 0005A - Process

Emission Source/Control: 0006A - Process

Emission Source/Control: 0007A - Process