Division of Air Resources

Permit Review Report

Permit ID: 4-2732-00014/00057
Renewal Number: 4
11/10/2021

Facility Identification Data
Name: KEYMARK CORP PLANT
Address: 1188 CAYADUTTA ST
FONDA, NY 12068

Owner/Firm
Name: KEYMARK CORPORATION
Address: 1188 CAYADUTTA ST
FONDA, NY 12068, USA
Owner Classification: Corporation/Partnership

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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
This application consists of the renewal of the facility's Title V permit. The application also includes the removal of Paint Line 2 from the facility (Emission Units U-00034, U-30001, and U-30002). Three changes that were made via the facility's operational flexibility protocol are also included. They are: the

replacement of the die cleaning system (U-00027), the addition of a static stack for emission units U-00016 and U-00017, and the installation of a sow preheater (emission unit U-00005). The facility's potential to emit calculations have been updated to reflect these changes.

Attainment Status
KEYMARK CORP PLANT is located in the town of MOHAWK in the county of MONTGOMERY. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
Keymark is an aluminum extrusion facility located in Fonda, New York. The basic flow of operations at the facility is as follows. Scrap aluminum, sows, ingots, etc. are charged to a melter which is heated by a natural gas burner. A typical charge is 55,000 pounds. At specified times, the molten aluminum is transferred to a holder which is subsequently tapped in order to cast logs. The cast logs are transferred to a homogenizing furnace in order to obtain the proper alloy structure. The homogenized logs, which may be supplemented with purchased logs, are then transferred to one of four extrusion presses. In the presses, the logs are preheated and then rammed through preheated dies in order to form the selected extruded shapes. The dies are manufactured in house in the tool and die shop. Once the extrusion run has been completed, the dies are taken to the die shop where they are immersed in heated alkaline solutions in order to melt out any residual aluminum. The extruded aluminum shapes are cut to specified lengths and placed into aging ovens which serve to harden the parts. Following the aging ovens, the extruded shapes undergo one of the following steps: surface coating, anodizing, or direct shipment to customers.

Surface coating is performed in a conveyorized paint spray line which includes the following sequence of steps; pretreatment with alkaline and acid showers, drying in an oven, coating, flash off, and curing in an oven. The paint line uses thermal oxidizers for volatile organic compound (VOC) control. Processes associated with the paint spray operations include mix rooms, a pyrolizing furnace in which dried paint is burned off the hooks used to hang the aluminum parts from the conveyor, and equipment clean up using solvent.

Anodizing is performed in a series of solution tanks in a separate portion of the facility. Extruded parts are placed into racks which are then transferred from tank to tank in order to impart a protective coating. Several of the tanks have exhaust systems that vent emissions through roof top mounted scrubbers.

Other activities at the facility include maintenance shops, a fill and debridge area in which resin is injected into the extruded part which is then machined so that a thermal break is formed, waste water treatment facilities, non contact cooling water towers, packaging, and shipping. All fuel fired equipment (heaters, ovens, solution tanks, etc.) use natural gas.

Permit Structure and Description of Operations

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

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

KEYMARK CORP PLANT is defined by the following emission unit(s):

Emission unit U00005 - This emission unit consists of the cast house melter for aluminum scrap, ingots, sows, etc. The furnace is heated with a natural gas burner. Emissions from melting and combustion are ducted through three stacks including the melter (EP 00005), fume hood (EP 00008), and the old sow heater stack (EP 00007). The fume hood is located over the entrance to the melter. The new sow preheater has a separate stack (EP 0007B). These operations are located in the cast house area of the main plant.

Emission unit U00005 is associated with the following emission points (EP):
00005, 00007, 00008, 0007B
Process: 004 is located at 1, Building 1 - This process involves the charging of the cast house melter with aluminum. A typical charge to the melter is 55,000 pounds of aluminum. Flux is typically added to each charge but the quantity of flux added is less than 0.5 percent of the total charge. Alloying elements, such as copper and manganese, may also be added. The melter emissions are exhausted through the melter stack (EP 00005), fume hood (EP 00008), and the old sow heater stack (EP 00007).

Process: E02 is located at 1, Building 1 - This process consists of the natural gas fired burner for the melter. The melter combustion emissions are exhausted through the melter stack (EP 00005), fume hood (EP 00008), and the old sow preheater stack (EP 00007).

Process: E16 is located at 1, Building 1 - This process consists of the natural gas fired sow preheater

burner.

Emission unit U00006 - This emission unit consists of the cast house holder for molten aluminum received from the cast house melter. The holder maintains molten aluminum at temperature prior to tapping and pouring into molds. The furnace is heated with a natural gas burner. Emissions from the molten aluminum and natural gas combustion are ducted through a single stack. Small quantities of magnesium and silicon may be added to the holder to meet certain alloy specifications.

Emission unit U00006 is associated with the following emission points (EP):
00006
Process: 005 is located at 1, Building 1 - This process consists of the holding, tapping, and pouring of molten aluminum received from the cast house melter. A typical charge to the holder is 55,000 pounds of aluminum. Magnesium ingots and silicon disks are typically added, but the quantity is less than 0.5 percent of the charge. Other alloying elements, such as copper, may also be added.

Process: E03 is located at 1, Building 1 - This process consists of the natural gas fired burner for the holder. The combustion emissions are exhausted through the stack of the holder.

Emission unit U00016 - This emission unit consists of the alkaline pretreatment shower for extruded aluminum parts prior to painting in Paint Line 1. Parts are sprayed with an alkaline solution as they pass through on a conveyor.

Emission unit U00016 is associated with the following emission points (EP):
00016, 00046
Process: 012 is located at 1, Building 5 - Extruded aluminum parts are sprayed with an alkaline pretreatment shower prior to painting resulting in the emission of liquid particulate through the steam vent that is located at the inlet to the shower system. The alkaline solution is drawn from a 2,900 gallon tank maintained at 150 F. The spray nozzle flow is 2.8 gallons per minute.

Emission unit U00017 - This emission unit consists of the acid pretreatment shower for extruded aluminum parts prior to painting in Paint Line 1. Parts are sprayed with an acid solution as they pass through on a conveyor.

Emission unit U00017 is associated with the following emission points (EP):
00017
Process: 013 is located at 1, Building 5 - Extruded aluminum parts are sprayed with an acid pretreatment shower prior to painting resulting in the emission of liquid particulate through the steam vent that is located at the outlet to the shower system. The acid solution is drawn from a 2,000 gallon tank maintained at 120 F. The spray nozzle flow is 2.8 gallons per minute.

Emission unit U00027 - This emission unit consists of heated alkaline solution tanks in which aluminum is removed from extrusion dies in the die shop. The tanks are heated with natural gas fired burners. The combustion emissions are exhausted with the process emissions.

Emission unit U00027 is associated with the following emission points (EP):
00027
Process: 01C is located at 1, Building 1 - This process consists of the fully automated die cleaning system. Dies are loaded into several baskets in the loading area. The baskets are conveyed inside the cleaning system where they are immersed in order to remove residual aluminum and then conveyed to the unloading area. Solutions of caustic soda and water are heated using a 0.67 MMBtu/hr natural gas burner. The system includes a fume vacuum and washing system. The tanks have process ventilation. Emissions are in the form of liquid particulate.

Process: F04 is located at 1, Building 1 - This process consists of one natural gas fired burner for the solution tanks. The combustion emissions are exhausted through the solution tanks stack.

Emission unit U00028 - This emission unit consists of the hook oven. Dried paint on conveyor hooks is removed in a controlled pyrolysis cleaning furnace. The furnace is heated with a natural gas fired burner. The combustion emissions are exhausted with the process emissions.

Emission unit U00028 is associated with the following emission points (EP):
00028
Process: 01D is located at 1, Building 1 - This process consists of the controlled pyrolysis heating furnace used to remove dried paint from batches of hooks. The hooks are used to suspend extruded aluminum parts painted in the paint spray line conveyor system. The furnace is heated with a natural gas fired burner. The majority of the paint is converted to ash and removed as waste.

Process: F05 is located at 1, Building 1 - This process consists of the natural gas fired burner for the pyrolysis furnace. The combustion emissions are exhausted through the stack of the furnace.

Emission unit U00029 - This emission unit consists of the fill and debridge area. Channels in extruded aluminum parts are filled with resin. A strip of aluminum is then removed in order to form a thermal barrier.

Emission unit U00029 is associated with the following emission points (EP):
00029
Process: 01E is located at 1, Building 2 - In order to form a thermal break in certain products (e.g. window frames) a two part resin is injected into a channel in the extruded part. A strip of aluminum is then machined away leaving a gap between the two parts of the aluminum extrusion. The two parts of the resin react with negligible emissions. The resin lines are flushed out using a solvent. There are minimal solvent emissions.

Emission unit U00035 - This emission unit consists of Paint Line 1. Paint Line 1 is a conveyorized paint spray operation in which extruded aluminum parts are hung from hooks and then subjected to the following operations: pretreatment acid and alkaline showers (Emission Units U-00016 and U-00017), drying oven, coating application in four spray booths using electrostatic disks, bake oven, and flash off. Paint is mixed and distributed from a separate room. Solvent is used to clean up the spraying equipment. Filters are used in all booths for particulate control. The exhausts of the booths, bake oven, smoke hood, and flash off area are vented through two thermal oxidizers which also have filters.

Emission unit U00035 is associated with the following emission points (EP):
00018, 00019, 00020, 00021, 00022, 00023, 00030, 00045
Process: 006 is located at 1, Building 1 - This process consists of the Paint Line 1 bake oven. Painted parts are conveyed through a bake oven. The oven is heated using a natural gas fired burner. Combustion emissions from the burner and the oven exhaust are vented through thermal oxidizers.

Process: 008 is located at 1, Building 1 - This process consists of Paint Line 1 paint spray booth 1. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 009 is located at 1, Building 1 - This process consists of Paint Line 1 spray booth 2. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 00A is located at 1, Building 1 - This process consists of Paint Line 1 spray booth 3. Paint is applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 00B is located at 1, Building 1 - This process consists of Paint Line 1 spray booth 4. Paint applied to extruded aluminum parts using an electrostatic disk mounted on a ram. Panel filters are used for particulate control. Exhaust is vented through thermal oxidizers which also have particulate control filters.

Process: 014 is located at 1, Building 1 - This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1that is primarily designed to remove heat from the area over the bake oven.

Process: 015 is located at 1, Building 1 - This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1that is primarily designed to remove heat from the area over the bake oven.

Process: 016 is located at 1, Building 1 - This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1that is primarily designed to remove heat from the area over the bake oven.

Process: 017 is located at 1, Building 1 - This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1that is primarily designed to remove heat from the area over the bake oven.

Process: 020 is located at 1, Building 1 - This process consists of a Paint Line 1 roof vent. One of five roof vents over Paint Line 1that is primarily designed to remove heat from the area over the bake oven.

Process: 022 is located at 1, Building 1 - This process consists of the smoke hood over the inlet/outlet to the bake oven for Paint Line 1. The purpose of the smoke hood is to vent heated air from the oven. The exhaust is vented through thermal oxidizers.

Process: 024 is located at 1, Building 1 - This process consists of the Paint Line 1 flash off tunnel. Following the application of coatings in the paint spray booths, the parts are conveyed through a flash off area. A vent over the area exhausts any emissions that occur during flash off through thermal oxidizers.

Process: E01 is located at 1, Building 1 - This process consists of the natural gas fired burner for the

Model 30 oxidizer (Oxidizer #1) with a maximum rated capacity of 2.81 mmBtu/hr.

Process: E13 is located at 1, Building 1 - This process consists of the natural gas fired burner for the Model 25 oxidizer (Oxidizer #2) with a maximum rated capacity of 2.7 mmBtu/hr.

Emission unit U00036 - This emission unit consists of four aging ovens and one homogenizing furnace. The aging ovens are natural gas fired Granco Clark units each with a maximum burner rating of 2 MMBtu/hr. The homogenizing furnace is a natural gas fired Remelt Technologies unit with a maximum burner rating of 18 MMBtu/hr. The furnace is housed in a separate building located to the north of the main plant. The only emissions associated with the ovens and furnaces are generated from the combustion of the natural gas.

Emission unit U00036 is associated with the following emission points (EP):
00036, 00037, 00038, 00039, 00043, 00044
Process: E06 is located at 1, Building 1 - This process consists of Aging Oven 1. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E07 is located at 1, Building 1 - This process consists of Aging Oven 2. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E08 is located at 1, Building 1 - This process consists of Aging Oven 3. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E09 is located at 1, Building 1 - This process consists of Aging Oven 4. Following extrusion in the presses, the aluminum is placed into aging ovens to temper the metal to the proper hardness. The oven is heated with a natural gas fired burner with a maximum rated capacity of 2 mmBtu/hr.

Process: E12 is located at 1, Building 3 - This process consists of the Remelt Technologies Homogenizing Furnace. Following casting, the aluminum logs are placed into the homogenizing furnace to reduce chemical separation of cast structures and improve workability. The furnace is heated by a natural gas fired burner with a maximum rated capacity of 18 MMBtu/hr. There are two exhaust stacks associated with this furnace since the furnace can travel to either of two locations.

Emission unit U10001 - This emission unit consists of the 15,000 gallon heated anodize line solution tank 2.

Emission unit U10001 is associated with the following emission points (EP):
10001
Process: 025 is located at 1, Building 2 - This process consists of a 15,000 gallon solution tank used in the aluminum anodize process. Racked parts are immersed in the tank in order to prepare the parts for subsequent processing. The tank is heated with a natural gas fired burner. Combustion emissions are exhausted separately. The reactions that occur in the tank in conjunction with the heating of the solution result in the emission of liquid particulate.

Emission unit U10007 - This emission unit consists of the 8,000 gallon heated anodize line alkaline solution tanks 5 and 7.

Emission unit U10007 is associated with the following emission points (EP):
10007
Process: 026 is located at 1802, Building 2 - Tanks 5 and 7 are both 8,000 gallon solution tanks used in the aluminum anodize process. Racked parts are immersed in the tanks in order to etch the aluminum parts in an alkaline solution prior to subsequent processing. The tanks are heated with natural gas fired burners. Combustion emissions are exhausted separately. The reactions that occur in the tanks in conjunction with the heating of the solutions result in the emission of liquid particulate. The emissions are controlled with a roof mounted Viron FRP Horizontal scrubber.

Emission unit U10008 - This emission unit consists of the 8,000 gallon anodize line acid solution tanks 12A and 12B.

Emission unit U10008 is associated with the following emission points (EP):
1008A
Process: 027 is located at 1802, Building 2 - Tanks 12A and 12B are both 8,000 gallon solution tanks used in the aluminum anodize process. Racked parts are immersed in the sulfuric anodizing baths in order to impart a hard coat to the parts prior to subsequent processing. The reactions that occur in the tanks result in the emission of liquid particulate. The emissions are controlled with a Viron PVC Mist Eliminator.

Title V/Major Source Status
KEYMARK CORP PLANT is subject to Title V requirements. This determination is based on the following information:
This facility is a major source of volatile organic compounds and hazardous air pollutants because the facility's potential to emit exceeds the applicable major source thresholds for those pollutants. The facility is also a major source of several individual hazardous air pollutants. Those are gylcol ethers, toluene, methyl isobutyl keytone, dimethyl phthalate, and xylenes.

Program Applicability
The following chart summarizes the applicability of KEYMARK CORP PLANT with regards to the principal air pollution
regulatory programs:

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

NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The

term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

SIC Codes
SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3354	ALUMINUM EXTRUDED PRODUCTS

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

SCC Code	Description
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-006-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Less Than 10 MMBtu/Hr
3-04-001-14	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Pouring/Casting
3-99-999-94	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified
4-02-008-10	SURFACE COATING OPERATIONS COATING OVEN - GENERAL General
4-02-025-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Coating Operation
4-02-025-99	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS

Other Not Classified

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN	0.0000315			
000078-59-1	2-CYCLOHEXEN-1-ONE,3,5,5-TRIMETHYL		5.2		
000108-10-1	2-PENTANONE, 4-METHYL		19.6		
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER		0.59		
007440-36-0	ANTIMONY	20			
007440-38-2	ARSENIC	2			
000071-43-2	BENZENE		0.01		
000098-82-8	BENZENE, (1-METHYLETHYL)		0.71		
007440-43-9	CADMIUM	60			
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS		83768		
000630-08-0	CARBON MONOXIDE		58.3		
007440-47-3	CHROMIUM	80			
007440-48-4	COBALT	40			
000131-11-3	DIMETHYL PHTHALATE		18.9		
000100-41-4	ETHYLBENZENE		6.1		
000050-00-0	FORMALDEHYDE		0.76		
000110-00-9	FURAN C4H4O	0.0000315			
068606-21-3	GLYCOLS, C10-16		50		
000110-54-3	HEXANE		1.2		
007647-01-0	HYDROGEN CHLORIDE		1.2		

007439-96-5	MANGANESE	2	
007439-97-6	MERCURY	0.4	
000067-56-1	METHYL ALCOHOL		0.71
000091-20-3	NAPHTHALENE		6.6
0NY210-00-0	OXIDES OF NITROGEN		69.4
0NY075-00-0	PARTICULATES		18.2
0NY075-02-5	PM 2.5		18.2
0NY075-00-5	PM-10		18.2
007446-09-5	SULFUR DIOXIDE		0.4
000108-88-3	TOLUENE		42.8
0NY100-00-0	TOTAL HAP		232.8
0NY998-00-0	VOC		236.2
001330-20-7	XYLENE, M, O & P MIXT.		79.4

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or

termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)
This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable

requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

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

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

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

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

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

Regulatory Analysis

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

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FACILITY	ECL 19-0301	72	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-A	27	Subpart A - General Provisions apply to all NESHAP affected sources
U-00035	40CFR 63-MMMM.3890(c)(2	42	Misc. Metal Parts & Products Surface Coating MACT - Alternative facility specific emission limits
U-00035	40CFR 63-MMMM.3891(c)	43	Misc. Metal Parts & Products Surface Coating NESHAP - Compliance options - Add-on Controls
U-00035	40CFR 63-MMMM.3892(b)	44	Misc. Metal Parts & Products Surface Coating NESHAP - Operating limits for add-on control devices
U-00035/-/E01/E001A	40CFR 63-MMMM.3892(b)	70	Misc. Metal Parts & Products Surface Coating NESHAP - Operating limits for add-on control devices
U-00035/-/E13/E0013	40CFR 63-MMMM.3892(b)	71	Misc. Metal Parts & Products Surface Coating NESHAP - Operating limits for add-on control devices
U-00035	40CFR 63-MMMM.3893(b)	45	Misc. Metal Parts & Products Surface Coating NESHAP - Work Practice Standards for add-on controls
U-00035	40CFR 63-MMMM.3900(a)(2	46	Misc. Metal Parts & Products Surface Coating NESHAP - General requirements
U-00035	40CFR 63-MMMM.3900(a)(2	47	Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements
U-00035	40CFR 63-MMMM.3900(b)	48	Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements
U-00035	40CFR 63-MMMM.3920(a)	49	Misc. Metal Parts & Products Surface Coating NESHAP - Reporting Requirements
U-00035	40CFR 63-MMMM.3920(b)	50	Misc. Metal Parts & Products Surface Coating NESHAP - Reporting

			requirements
U-00035	40CFR 63-MMMM.3930	51	Misc. Metal Parts & Products Surface Coating - Recordkeeping Requirements
U-00035	40CFR 63-MMMM.3931	52	Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements
U-00035	40CFR 63-MMMM.3963(a)	53	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
U-00035	40CFR 63-MMMM.3963(b)	54	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
U-00035	40CFR 63-MMMM.3963(c)	55	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
U-00035	40CFR 63-MMMM.3963(d)	56	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
U-00035	40CFR 63-MMMM.3963(e)	57	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
U-00035	40CFR 63-MMMM.3963(f)	58	Misc. Metal Parts & Products Surface Coating NESHAP - Continuous compliance provisions
U-00035	40CFR 63-MMMM.3964(b)	59	Misc. Metal Parts and Products Surface Coating NESHAP - Performance test requirements
U-00035	40CFR 63-MMMM.3967(a)	60	Misc. Metal Parts & Products Surface Coating NESHAP - Establishing operating limits for add-on control device
U-00005	40CFR 63-MMMM.3967(f)	30	Misc. Metal Parts & Products Surface Coating NESHAP - emission capture system and add-on control device operating limits
U-00035	40CFR 63-MMMM.3968(a)	61	Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems

U-00035	40CFR 63-MMMM.3968(b)	62	Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems
U-00035	40CFR 63-MMMM.3968(c)	63, 64, 65	Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems
U-00035	40CFR 63-MMMM.3968(g)	66, 67, 68, 69	Misc. Metal Parts & Products Surface Coating NESHAP - Requirements for continuous parameter monitoring systems
FACILITY	40CFR 68	18	Chemical accident prevention provisions
FACILITY	40CFR 82-F	19	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	73	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	20, 28, 29	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	21	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification

FACILITY	6NYCRR 201-6.4(f)	22	Operational Flexibility
FACILITY	6NYCRR 201-6.4(f)(2)	23	Operational Flexibility - Protocol
FACILITY	6NYCRR 201-6.5(a)	74	State Enforceable Requirements
FACILITY	6NYCRR 202-1.1	17	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	24	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.6(a)	25	Limiting of Opacity
FACILITY	6NYCRR 212-2.3(b)	75, 76, 77	State Air Program Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 212-2.4(b)	26	Control of Particulate from New and Modified Process Emission Sources
U-00035	6NYCRR 212-2.4(b)	31	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
U-00035	6NYCRR 228-1.3(a)	32	Surface Coating General Requirements-Opacity
U-00035	6NYCRR 228-1.3(b)(1)	33	General Requirements - Record Keeping
U-00035	6NYCRR 228-1.3(d)	34	Surface Coating General Requirements-Handling, storage and disposal
U-00035	6NYCRR 228-1.3(e)	35	Surface Coating - General control requirements (Class A & most B)
U-00035	6NYCRR 228-1.4(b)(4)	36	Miscellaneous Metal Parts Coatings
U-00035	6NYCRR 228-1.5(b)	37	Natural gas incineration of VOCs
U-00035	6NYCRR 228-1.6(a)	38	Surface coating VOC analysis.
U-00035	6NYCRR 228-1.6(d)	39	Surface coating control equipment test methods
U-00035	6NYCRR 228-1.6(e)	40	Surface coating control efficancy test methods
U-00035	6NYCRR 228-1.6(h)	41	Records reporting and maintaining

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

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, KEYMARK CORP PLANT has been determined to be subject to the following regulations:
40 CFR 63.3890 (c) (2)
This section gives the facility owner or operator the option of calculating and complying with a facility specific emission limit in order to demonstrate compliance with the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3891 (c)
This section outlines the requirements that the facility must meet in order to demonstrate compliance with the emission rate with add-on controls compliance option allowed under 40 CFR 63 Subpart MMMM.

40 CFR 63.3892 (b)
This section requires that facilities using the emission rate with add-on controls compliance option

allowed under 40 CFR 63 Subpart MMMM to comply with the operational limitations presented in Table 1 of Subpart MMMM. The operational limits must be established during a performance test as described in 40 CFR 63.3967.

40 CFR 63.3893 (b)
This section contains the various work practice standards that must be met by facilities that are subject to the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3900 (a) (2) (i)
This section outlines the general requirements for facilities that are subject to the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3900 (a) (2) (ii)
This section outlines the general requirements for facilities that are subject to the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3900 (b)
This section requires the facility owner or operator to operate the emission source subject to the requirements of 40 CFR 63 Subpart MMMM in compliance with the requirements of 40 CFR 63.6(e)(1)(i) at all times.

40 CFR 63.3920 (a)
This section outlines the required content of semiannual reports submitted by the facility owner or operator.

40 CFR 63.3920 (b)
This section states that performance test reports must be submitted within 60 days of the completion of testing at the facility.

40 CFR 63.3930
This regulation defines the requirements for recordkeeping for each compiance option under Subpart MMMM

40 CFR 63.3931
This regulation specifies the length of time records must be kept under Subpart MMMM

40 CFR 63.3963 (a)
This section outlines the methods the facility owner or operator must use in order to demonstrate compliance with the applicable emission limit in 40 CFR 63.3890.

40 CFR 63.3963 (b)
This section states that an emission rate exceeding the applicable emission rate specified in 40 CFR 63.3890 is a deviation that must be reported as described in 40 CFR 63.3910(c)(6) and 63.3920(a)(7).

40 CFR 63.3963 (c)
This section outlines the methods used to demonstrate continuous compliance with each operating limit that applies to the facility.

40 CFR 63.3963 (d)
This section outlines the procedures that must be followed if a bypass line is opened.

40 CFR 63.3963 (e)
This section state that the facility must demonstrate continuous compliance with the applicable work practice standards.

40 CFR 63.3963 (f)
This section requires the facility owner or operator to identify each coating operation for which the emission rate with add-on controls compliance option was used in each semiannual report.

40 CFR 63.3964 (b)
This section outlines the requirements for performance tests conducted on the emission capture system.

40 CFR 63.3967 (a)
This section outlines the methods the facility owner or operator must use to establish the operating limits for a thermal oxidizer installed to comply with the requirements of 40 CFR 63 Subpart MMMM.

40 CFR 63.3967 (f)
This section describes the methods that the facility owner or operator must use to establish operating limits for the emissions capture system required by 40 CFR 63 Subpart MMMM.

40 CFR 63.3968 (a)
This section outlines the installation, operation, and maintenance requirements for continuous parameter monitoring systems installed pursuant to 40 CFR 63 Subpart MMMM.

40 CFR 63.3968 (b)
This section describes the requirements for emission capture systems that contain a bypass line.

40 CFR 63.3968 (c)
This section outlines the requirements for thermal and catalytic oxidizers used to demonstrate compliance with the emission rate with add-on controls compliance option under 40 CFR 63 Subpart MMMM.

40 CFR 63.3968 (g)
This section outlines the requirements for the emissions capture system monitoring system.

40 CFR Part 63, Subpart A
The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40 CFR 63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that descibe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

6 NYCRR 201-6.4 (f)
This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 201-6.4 (f) (2)
This section describes the requirements for operational flexibility protocols included in Title V permits. The facility owner or operator may make certain changes to the facility that have been reviewed and approved pursuant to the protocol without first obtaining a permit modification for those changes.

6 NYCRR 201-6.5 (a)
This subdivision states that the Department shall include state enforceable conditions in Title V permits. State enforceable conditions related to regulations developed pursuant to the Climate Leadership and Community Protection Act (CLCPA) and Article 75 of New York State Environmental Conservation Law may be included in future versions of this permit, as applicable.

6 NYCRR 212-1.6 (a)
This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.3 (b)
Table 4 of 212-2.3 describes the reduction in emissions required for a non-criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

6 NYCRR 212-2.4 (b)
Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 228-1.3 (a)
This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b) (1)
This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (d)
This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.3 (e)
This regulation outlines the general control requirements for emissions of volatile organic compounds related to surface coating.

6 NYCRR 228-1.4 (b) (4)
This section specifies the VOC content limits for miscellaneous metal parts coatings at facilities subject to 6 NYCRR Subpart 228-1.

6 NYCRR 228-1.5 (b)
This section specifies the operating requirements for thermal oxidizers operated to comply with the requirements of 6 NYCRR Subpart 228-1.

6 NYCRR 228-1.6 (a)
This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirments of the regulation.

6 NYCRR 228-1.6 (d)
This section specifies the acceptable test methods for emissions tests conducted on control equipment operated at facilities subject to 6 NYCRR Subpart 228-1.

6 NYCRR 228-1.6 (e)
This section contains the notification requirements for testing conducted pursuant to 6 NYCRR Subpart 228-1.

6 NYCRR 228-1.6 (h)

This citation requires the facility owner or operator to divulge any information or record showing noncompliance with the requirements of the regulation to the Department within 30 days and to maintain this information on the premisis for a period of 5 years.

Permit ID: 4-2732-00014/00057
Renewal Number: 4
11/10/2021

Compliance Certification
Summary of monitoring activities at KEYMARK CORP PLANT:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-00035	43	record keeping/maintenance procedures
U-00035	44	monitoring of process or control device parameters as surrogate
U-00035/-/E01/E001A	70	monitoring of process or control device parameters as surrogate
U-00035/-/E13/E0013	71	monitoring of process or control device parameters as surrogate
U-00035	45	record keeping/maintenance procedures
U-00035	49	record keeping/maintenance procedures
U-00035	51	record keeping/maintenance procedures
U-00035	53	record keeping/maintenance procedures
U-00035	54	record keeping/maintenance procedures
U-00035	55	record keeping/maintenance procedures
U-00035	56	record keeping/maintenance procedures
U-00035	57	record keeping/maintenance procedures
U-00035	58	record keeping/maintenance procedures
U-00035	59	record keeping/maintenance procedures
U-00035	60	record keeping/maintenance procedures
U-00005	30	record keeping/maintenance procedures
U-00035	61	record keeping/maintenance procedures
U-00035	62	record keeping/maintenance procedures
U-00035	63	record keeping/maintenance procedures
U-00035	64	record keeping/maintenance procedures
U-00035	65	record keeping/maintenance procedures
U-00035	66	record keeping/maintenance procedures
U-00035	67	record keeping/maintenance procedures
U-00035	68	record keeping/maintenance procedures
U-00035	69	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	75	work practice involving specific operations
FACILITY	76	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
FACILITY	26	intermittent emission testing
U-00035	31	record keeping/maintenance procedures
U-00035	32	monitoring of process or control device parameters as surrogate
U-00035	33	record keeping/maintenance procedures
U-00035	34	record keeping/maintenance procedures
U-00035	36	record keeping/maintenance procedures
U-00035	38	record keeping/maintenance procedures
U-00035	41	record keeping/maintenance procedures

Basis for Monitoring
40 CFR 63 Subpart MMMM:

The surface coating operations at this facility are subject to the requirements of 40 CFR 63 Subpart MMMM. The facility has chosen to use the facility specific emission rate compliance option under that rule. To meet the emission rate, the facility operates two regenerative thermal oxidizers and continuously monitors the temperature of those units. The oxidizers have a bypass stack equipped with a continuous monitor that alarms if the bypass is open. In addition, the paint line is contained within a permanent total enclosure. Keymark continuously monitors the negative pressure across the permanent total enclosure. Periods where the oxidizers are not at the required temperature, the permanent total enclosure pressure is low, or the bypass is open are treated as if there was no control for the purposes of calculating the facility specific emission limit.

The facility is required to conduct stack testing of the regenerative thermal oxidizers once every five years. The results of this testing determine the minimum temperature limits specified in the permit.

40 CFR Part 64:

This facility is not subject to the requirements of 40 CFR Part 64 because the paint line is subject to a NESHAP promulgated after November 15, 1990. Further, the potentially subject control devices are monitored continuously as described in the facility's permit.

40 CFR 63 Subpart RRR:

This facility is not subject to the requirements of 40 CFR 63 Subpart RRR because no external scrap or recycled aluminum is accepted. All aluminum used in the facility's melter is virgin material or internal scrap.

6 NYCRR Part 212:

The acid and alkaline pretreatment showers (U-00016 and U-00017) operated at Keymark Corporation are subject to the requirements of 6 NYCRR Part 212 (Part 212). The contaminants emitted by these emission units have been assigned the following environmental ratings by the Department:

Chromic acid – A
Hydrofluoric acid – B
Phosphoric acid – B
Sodium hydroxide – B

Keymark is required to demonstrate that these emissions will not exceed the applicable short term or annual guideline concentration as described in 6 NYCRR Part 212-2.3(b). Accordingly, Keymark has completed air dispersion modeling analysis for each contaminant based on the results of a stack test conducted on the existing pretreatment showers on 7/29/2015. The modeling analysis was performed by the facility using the 2015 stack test data.

Since the chromic acid used by this facility includes both chromium compounds and hexavalent chromium, Keymark is required to demonstrate that the facility meets the mass emission threshold in 6 NYCRR Part 212-2.2 or the annual guideline concentration for those contaminants. The facility's emissions exceed both values. Accordingly, the Department performed a T-BACT analysis for this process. Due to the

conservative approach used in the modeling and the design of the shower process, the Department has determined that the actual concentration of these compounds emitted, and the modeled impact, are likely less than what is being reported. Further, the shower has been designed to minimize emissions in a reasonable manner. Accordingly, T-BACT has been applied to this process, and no further action by Keymark is necessary at this time.

In order to ensure that emissions of chromium compounds and hexavalent chromium do not exceed the level used in the T-BACT determination, this permit contains a condition limiting the amount of chromic acid that may be used at the facility on an annual basis. The facility owner or operator will maintain chromic acid usage records and is required to perform a new dispersion modeling analysis if the usage exceeds the value described in the permit for two consecutive months.

The acid and caustic scrubbers associated with emission units U-10007 and U-10008 are also subject to the requirements of Part 212. In order to demonstrate compliance, Keymark must conduct monthly inspections of each scrubber and ensure that it is functioning as described by the manufacturer's specifications.

Additionally, Keymark must ensure that each paint booth is equipped with an appropriate filter and must replace the filters as necessary to ensure that particulate emissions from the painting process are captured.

Finally, various emission points at this facility are subject to the opacity standard under Part 212.

6 NYCRR Subpart 228-1:

The coating processes at this facility are Class B coating lines subject to the VOC content limits for miscellaneous metal parts coatings under Table B4 of Section 228-1.4. However, Keymark has opted to operate a regenerative thermal oxidizer to control VOC emissions rather than spraying compliant coatings, as described in Section 228-1.5. To demonstrate compliance, Keymark must ensure that a control efficiency of 90% is met. The most recent stack test of the facility's oxidizers conducted for demonstrating compliance with 40 CFR 63 Subpart MMMM indicates that the control efficiency is greater than 98%. Additionally, Keymark must monitor the temperature of the oxidizers. Temperature monitoring is also required by 40 CFR 63 Subpart MMMM. Accordingly, by complying with the Subpart MMMM requirement, the facility is also complying with Subpart 228-1. Keymark is also subject to the work practice standards as described in Subpart 228-1.