

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00025/00059

Renewal Number: 2

03/25/2024

Facility Identification Data

Name: KENNEDY VALVE DIV MC WANE INC

Address: 1021 E WATER ST

ELMIRA, NY 14901

Owner/Firm

Name: MCWANE INC

Address: PO BOX 43327

BIRMINGHAM, AL 35243-3327, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: KIMBERLY A MERCHANT

Address: 6274 E AVON LIMA RD

AVON, NY 14414-9519

Phone:5852262466

Division of Air Resources:

Name: ZACHARY TENNIES

Address: 6274 E Avon Lima Rd

Avon, NY 14414-9519

Phone:7162262466

Air Permitting Contact:

Name: CHERISE HAASE

Address: KENNEDY VALVE

1021 E WATER ST

ELMIRA, NY 14901

Phone:6073781419

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

Application for Renewal 2 of the Air Title Facility (ATV) permit. Permit Renewal 2 was originally Public Noticed as Draft between January 22, 2020 and February 21, 2020. During the initial Public Notice period, the Department requested that the facility evaluate the impacts of High Toxicity Air Contaminants

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(HTACs) in accordance with 6 NYCRR Part 212. The Renewal 2 permit was revised to include additional requirements consistent with Part 212 and T-BACT analysis discussed below.

This renewal incorporates projects which were approved under Operational Flexibility including: Addition of two new core making machines under Process 013, Emission Source S0038; replacement of an existing core making machine with a new core making machine under Emission Source S0038; and the addition of a gas metal arc welding process as Process 024, Emission Source S0034 under existing Emission Unit E-00006 that is controlled using a new dust collector (Emission Source S0092.)

Renewal 2 also adds incorporates conditions to demonstrate compliance with 6 NYCRR Part 212 for iron foundry operations. This includes conditions consistent with the Part 212 evaluation and T-BACT analysis for the iron pouring, cooling, and shakeout operations (Emission Units E-0002 and E-00003).

Relocation and removal of permit conditions have been made where necessary as part of this renewal to reflect the above changes. Miscellaneous changes to permit conditions have been made to reflect updated regulations or to improve clarity. Specific changes are noted in the Basis of Monitoring Section.

Attainment Status

KENNEDY VALVE DIV MC WANE INC is located in the town of ELMIRA in the county of CHEMUNG.

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*	TRANSPORT REGION (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:

Kennedy Valve manufactures products for use in waterworks distribution, potable and wastewater treatment and fire protection systems (NAICS 332911). Products include fire hydrants, indicator posts and various types of valves. Processes include an iron foundry, casting of metal parts, machining operations and surface coating using both liquid and powder coatings.

Permit Structure and Description of Operations

The Title V permit for KENNEDY VALVE DIV MC WANE INC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source

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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.

KENNEDY VALVE DIV MC WANE INC is defined by the following emission unit(s):

Emission unit E00002 - Pouring and Cooling: A ladle containing molten metal is moved to the pouring line where the metal is poured into sand molds. From the pouring station, the filled molds travel by conveyor through the cooling zone.

Emission unit E00002 is associated with the following emission points (EP):

00067, 00068, 00069, 00070, 00071, 00090, 00091, 000PC

Process: 004 is located at POURING LINE, Building E - Iron Pouring: The ladle is moved to the pouring line where molten metal is poured into sand molds with the cores.

Process: 005 is located at COOLING LINE, Building E - Mold Cooling: Sand molds containing molten iron are conveyed in cars on moving rollers while the iron solidifies.

Emission unit E00003 - Shakeout, Sand Handling and Mold Making: Cooled molds are transferred to a rotary shakeout machine and rotary drum to separate the castings from the molds. Sand is screened and transferred to the muller where it is reused in making molds.

Emission unit E00003 is associated with the following emission points (EP):

00089

Process: 006 is located at SHAKEOUT AREA, Building D - Casting Shakeout: Sand molds containing solidified iron castings are directed to a shakeout machine which separates the sand from the castings. The castings are then conveyed to a rotary drum for further sand removal.

Process: 007 is located at Building D - Sand which is separated from the castings is directed through a screening station to remove core butts and fused sand. It is then further screened and directed through two magnetic separators, water addition, a fluidized bed cooler, and a bucket elevator to the return sand silo.

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Process: 008 is located at MOLD LINE, Building D - Mold Making: Recycled sand from the sand system is used to produce sand molds.

Emission unit E00005 - Core Making: Sand cores are made in one of three methods; shell core, Novaset or Isocure. Cores are washed in a water based material to improve surface characteristics.

Emission unit E00005 is associated with the following emission points (EP):
00085

Process: 011 is located at MOLD DEPARTMENT, Building D - Core making: Resin coated sand is purchased in large tote bags and transferred as needed into hoppers over ten shell core machines. The sand is metered into each machine where heat is applied to set the cores. The cores are washed in a water based material to improve surface properties.

Process: 012 is located at MOLD DEPARTMENT, Building D - Core making: Uncoated sand is metered into five core machines where the binder chemicals are mixed, an ester-based co-reactant and pressure are used to form the cores. The cores are washed in a water based material to improve surface properties.

Process: 013 is located at MOLD DEPARTMENT, Building D - Core making: Uncoated sand is pneumatically conveyed into five core machines where an amine catalyst is used to activate the binder and cure the cores. The cores are washed in a water based material to improve surface properties and conveyed through one of three ovens associated with the Leampe machines.

Emission unit E00006 - Finishing: After castings are cleaned and welded as necessary, they are surface coated as needed in one of two powder coat booths or spray booths. The coating booths are equipped with fabric filters to reduce emissions of particulate matter.

Emission unit E00006 is associated with the following emission points (EP):
00056, 00060

Process: 015 is located at Building H - Spray Painting: Castings requiring custom paint are painted in two spray booths each with a dry filter and exhaust fan.

Process: 024 is located at Building H - Industrial Welding: Castings are spot welded using a gas metal arc welding (GMAW) process.

Emission unit E00001 - Melting: Scrap metal is preheated via a natural gas fired preheater then charged into one of three coreless induction melting furnaces. Molten metal is tapped from the furnace into a ladle and alloys may be added to achieve the desired chemistry.

Emission unit E00001 is associated with the following emission points (EP):

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00088

Process: 001 is located at MELT DEPARTMENT, Building F - Scrap Preheating: Pig iron, returns, scrap steel, and machine cast is preheated using a natural gas-fired preheater prior to melting to a temperature of 1,100 degrees F.

Process: 002 is located at MELT DEPARTMENT, Building F - Iron Melting: Preheated metal scrap is melted using coreless induction furnaces. Alloys are added as needed for desired metal chemistry.

Process: 003 is located at MELT DEPARTMENT, Building F - Ductile Treatment: Magnesium is added to the treatment ladle as needed to make ductile iron.

Title V/Major Source Status

KENNEDY VALVE DIV MC WANE INC is subject to Title V requirements. This determination is based on the following information:

The facility is a major source of air emissions due to potential-to-emit (PTE) emissions of carbon monoxide and particulate matter greater than 100 tons per year and emissions of volatile organic compounds (VOCs) greater than 50 tons per year. Therefore, the facility is required to obtain an Air Title V permit.

Program Applicability

The following chart summarizes the applicability of KENNEDY VALVE DIV MC WANE INC 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	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52.21, 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.

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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

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distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3321	GRAY IRON FOUNDRIES
3491	INDUSTRIAL VALVES

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
3-04-003-03	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-20	Electric Induction Furnace SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-25	Pouring/Casting SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-31	Castings Cooling SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-50	Casting Shakeout SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-70	Sand Grinding/Handling SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-71	Shell Core Machine SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-04-003-99	Core Machines/Other SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES
3-09-052-76	Other Not Classified FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - GAS METAL ARC WELDING (GMAW) ERNICRMO ELECTRODE - GAS METAL ARC WELDING

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

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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 of 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
000108-38-3	1,3 DIMETHYL BENZENE		0.595		
000090-12-0	1- METHYLNAPHTHA LENE		0.215		
000091-57-6	2-METHYL NAPHTHALENE		0.38		
000095-48-7	2-METHYL- PHENOL		2.48		
000996-35-0	2- PROPANAMINE, N,N-DIMETHYL		0.384		
000075-07-0	ACETALDEHYDE		1.21	192.9	
000062-53-3	ANILINE		4.9	108.4	
007440-36-0	ANTIMONY		0.008		
007440-38-2	ARSENIC		0.0016	0.709	
000121-69-7	BENZENAMINE, N, N-DIMETHYL		1.139		
000071-43-2	BENZENE	19000		3599.7	
000098-82-8	BENZENE, (1- METHYLETHYL)		0.025		
000095-47-6	BENZENE, 1, 2- DIMETHYL		4.216		
007440-41-7	BERYLLIUM		7.0E-6	0.003	
007440-43-9	CADMIUM		0.007	0.745	
000630-08-0	CARBON MONOXIDE		542.5		
007440-47-3	CHROMIUM		0.049	7.761	
007440-48-4	COBALT		0.668	291.4	
000100-41-4	ETHYLBENZENE		0.827		
000050-00-0	FORMALDEHYDE		0.438	191.1	
007439-92-1	LEAD		0.011	12.646	
007439-96-5	MANGANESE		0.199	43.854	
007439-97-6	MERCURY		0.0001	0.006	
000078-93-3	METHYL ETHYL KETONE		0.0017		
000926-63-6	N,N- DIMETHYLPROPY LAMINE		0.384		
000091-20-3	NAPHTHALENE		1.16		
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		0.14	61.12	
0NY210-00-0	OXIDES OF NITROGEN		14.41		

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0NY075-00-0	PARTICULATES		648.6
000108-95-2	PHENOL	19000	
000108-39-4	PHENOL, 3-METHYL		0.784
0NY075-00-5	PM-10		619.2
007782-49-2	SELENIUM		0.003
007446-09-5	SULFUR DIOXIDE		3.96
000108-88-3	TOLUENE		7.58
0NY100-00-0	TOTAL HAP	49000	
0NY998-00-0	VOC		120.3
001330-20-7	XYLENE, M, O & P MIXT.		0.037
000106-42-3	XYLENE, PARA-		0.022

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.

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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

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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

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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 Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
----- -- FACILITY	ECL 19-0301	78	Powers and Duties of the Department with

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FACILITY	40CFR 60-IIII	45	respect to air pollution control Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
E-00006/-/015	40CFR 63- MMMM.3890 (b) (1)	69	Misc. Metal Parts & Products Surface Coating NESHAP - Emission Limits - Existing General Use Coating
E-00006/-/015	40CFR 63- MMMM.3891 (b)	70	Misc. Metal Parts & Products Surface Coating Compliance Options - Emission rate without add-on controls
E-00006/-/015	40CFR 63- MMMM.3901	71	Misc. Metal Parts & Products Surface Coating NESHAP - General Requirements
E-00006/-/015	40CFR 63- MMMM.3920 (a)	72	Misc. Metal Parts & Products Surface Coating NESHAP - Reporting Requirements
E-00006/-/015	40CFR 63- MMMM.3930	73	Misc. Metal Parts & Products Surface Coating - Recordkeeping Requirements
E-00006/-/015	40CFR 63- MMMM.3931	74	Misc. Metal Parts & Products Surface Coating NESHAP - Recordkeeping requirements
E-00006/-/024	40CFR 63- XXXXXX.11516 (f)	75	Nine Metal Fabrication and Finishing Area Source NESHAP - Welding Standards
E-00006/-/024	40CFR 63- XXXXXX.11519 (b)	76	Nine Metal Fabrication and Finishing Area Source NESHAP - Reporting
E-00006/-/024	40CFR 63- XXXXXX.11519 (c)	77	Nine Metal Fabrication and Finishing Area Source NESHAP - Recordkeeping
E-00001	40CFR 63- ZZZZ.10885 (a)	53	Restricted Metallic Scrap Management Program
FACILITY	40CFR 63- ZZZZ.10885 (b)	46	Use Of Scrap That Does Not Contain Motor Vehicle Scrap Management Practices For Binder Formulations
E-00005	40CFR 63- ZZZZZ.10886	59	Capture And Control Requirements for New And Existing Large
E-00001	40CFR 63- ZZZZ.10895 (b)	54	

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E-00001/00088	40CFR 63- ZZZZZ.10895 (c)	58	Foundries Particulate Matter Emission Limit For Existing Large Iron And Steel Foundries
FACILITY	40CFR 63- ZZZZZ.10895 (e)	47	Fugitive Emission Requirements For Large Iron And Steel Foundries
E-00001	40CFR 63- ZZZZZ.10896 (a)	55	Operation and Maintenance requirements for large iron and steel foundries
E-00001	40CFR 63- ZZZZZ.10897 (a)	56	Inspection Requirements For Fabric Filters At Large Iron And Steel Foundries
E-00001	40CFR 63- ZZZZZ.10897 (d)	57	Requirements For Bag Leak Detectors At Large Iron And Steel Foundries
FACILITY	40CFR 63- ZZZZZ.10897 (e)	48	Inspection Requirements For Capture Systems At Large Iron And Steel Foundries
FACILITY	40CFR 63- ZZZZZ.10897 (f)	49	Continuous Parameter Monitoring System Requirements For Large Iron And Steel Foundries
FACILITY	40CFR 63- ZZZZZ.10897 (g)	50	Requirements After An Emissions Exceedance At Large Iron And Steel Foundries
FACILITY	40CFR 68	17	Chemical accident prevention provisions
FACILITY	40CFR 82-F	18	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	79	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	19, 51, 52	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	14	General Conditions - Requirement to

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FACILITY	6NYCRR 201-6.4 (a) (7)	2	Provide Information
FACILITY	6NYCRR 201-6.4 (a) (8)	15	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4 (c) (3) (ii)	5	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4 (d) (4)	20	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (f)	21	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f) (2)	22	Operational Flexibility
FACILITY	6NYCRR 201-7.1	23	Operational Flexibility - Protocol
FACILITY	6NYCRR 202-1.1	16	Emission Capping in Facility Permits
FACILITY	6NYCRR 202-2.4 (a) (3)	26	Required emissions tests.
FACILITY	6NYCRR 202-2.5	7	Emission statement methods and procedures
FACILITY	6NYCRR 211.1	80	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	27	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212-1.5 (d)	28, 29, 30, 31	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.5 (e) (2)	81	BACT or T-BACT for process emission sources
FACILITY	6NYCRR 212-2.1 (a)	82	Demonstrating compliance for Part 212 through the federal NESHAP program
FACILITY	6NYCRR 212-2.3 (b)	32	HTACs applicable to Table 212-2.3 Table 4 State Air Program
E-00005/-/013/S0024	6NYCRR 212-2.3 (b)	60	Non-Criteria air contaminants subject Table 4
E-00005/00085/013	6NYCRR 212-3.1 (c) (4) (i)	61	State Air Program Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 215.2	8	RACT compliance plan control limits for Capture and Control
FACILITY	6NYCRR 216.3	33, 34, 35, 36	Open Fires - Prohibitions
			Particulate emissions.

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FACILITY	6NYCRR 216.4	37	Opacity of emissions.
FACILITY	6NYCRR 216.5	38	Gaseous emissions.
FACILITY	6NYCRR 226-1.3	39	General Requirements
FACILITY	6NYCRR 226-1.4 (a)	40, 41, 42	Cold cleaning controls (internal volume greater than two gallons)
FACILITY	6NYCRR 226-1.5 (a)	43	Cold cleaning degreasing
E-00006/-/015	6NYCRR 228-1.1 (a) (3)	62	Once in always in
E-00006/-/015	6NYCRR 228-1.3 (a)	63	Surface Coating General Requirements- Opacity
E-00006/-/015	6NYCRR 228-1.3 (b) (1)	64	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3 (c)	44	Surface Coating General Requirements- Prohibitions
E-00006/-/015	6NYCRR 228-1.3 (d)	65	Surface Coating General Requirements- Handling, storage and disposal
E-00006/-/015	6NYCRR 228-1.4 (b) (4) (ii)	66	Misc. metal parts coatings VOC content limits
E-00006/-/015	6NYCRR 228-1.6 (a)	67	Surface coating VOC analysis.
E-00006/-/015	6NYCRR 228-1.6 (c)	68	Surface coating access for sampling

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

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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.

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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 202-2.5

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 their 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

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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, KENNEDY VALVE DIV MC WANE INC has been determined to be subject to the following regulations:

40 CFR 63.10885 (a) (1)

Requirements for restricted metallic scrap management program. These requirements list scrap items that are not allowed in parts of the facility that are regulated under this program.

40 CFR 63.10885 (b) (4)

This regulation requires that the owner or operator must certify that scrap purchased does not contain motor vehicle scrap.

40 CFR 63.10886

Management Practices For Binder Formulations. These requirements restrict the use of methanol as a specific ingredient of the catalyst formulation.

40 CFR 63.10895 (b)

Capture And Control Requirements for New And Existing Large Foundries. Capture and collection systems are required unless furnace is part of an emissions averaging group.

40 CFR 63.10895 (c) (1)

This regulation specifies the particulate matter emission limit for existing large iron and steel foundries.

40 CFR 63.10895 (e)

This regulation specifies the fugitive emission requirements for large iron and steel foundries. Fugitive emissions are limited to 20% opacity except for one six minute average per hour of 30%.

40 CFR 63.10896 (a)

This condition sets forth the operation and maintenance requirements for this facility. specifically it calls for an operation and maintenance plan for all control devices at the facility.

40 CFR 63.10897 (a) (1)

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This regulation specifies the inspection requirements for fabric filters at large iron and steel foundries. The owner or operator must conduct monthly visual inspections and inspect the inside of the baghouse every six months.

40 CFR 63.10897 (d)

This regulation specifies the requirements for bag leak detectors at large iron and steel foundries. The owner or operator may install, operate and maintain a bag leak detection system as an alternative to inspection requirements in 40CFR 63.10897(a)(1).

40 CFR 63.10897 (e)

Inspection Requirements For Capture Systems At Large Iron And Steel Foundries. The owner or operator must inspect equipment that is important to the performance of the capture system monthly.

40 CFR 63.10897 (f)

Continuous Parameter Monitoring System Requirements For Large Iron And Steel Foundries. The owner or operator must operate in accordance to his/her operating and maintenance plan.

40 CFR 63.10897 (g)

Requirements After An Emissions Exceedance At Large Iron And Steel Foundries. In the event of an exceedance the owner or operator must restore operation to normal or usual manner of operation as expeditiously as practicable.

40 CFR 63.11516 (f)

This regulation specifies the management practices or fume control requirements for welding operations that use metal fabrication HAPs.

40 CFR 63.11519 (b)

This regulation requires submission of annual certification and compliance reports for each affected source subject to 40 CFR 63, Subpart XXXXXX.

40 CFR 63.11519 (c)

This regulation specifies the recordkeeping requirements for affected sources subject to 40 CFR 63, Subpart XXXXXX.

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40 CFR 63.3890 (b) (1)

This regulation sets the emission limit for organic Hazardous Air Pollutants (HAPs) at existing general use affected sources.

40 CFR 63.3891 (b)

This regulation applies to a facility that has chosen to comply with the emission limit by meeting an "emission rate without add-on controls" by measuring the amount of organic HAPs per amount of coating solids used (in kg/l or lb/gal). This is one of three options available for compliance.

40 CFR 63.3901

This regulation refers to Table 2 of the Subpart which outlines the various general requirements in 40 CFR 63 Subpart A (63.1 through 63.15) that apply to this facility.

40 CFR 63.3920 (a)

This section outlines the required content of semiannual reports submitted by the facility owner or operator.

40 CFR 63.3930

This regulation defines the requirements for recordkeeping for each compliance option under Subpart Mmmm

40 CFR 63.3931

This regulation specifies the length of time records must be kept under Subpart Mmmm

40 CFR Part 60, Subpart IIII

This regulation defines performance standards for compression ignition stationary reciprocating internal combustion engines.

6 NYCRR 201-6.4 (f)

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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 regulation describes operational flexibility protocols which may allow the facility owner or operator to make certain changes at the facility without the need for a permit modification. Changes made pursuant to the protocol must be approved by the Department, and will be rolled into the permit during the next renewal or modification.

6 NYCRR 201-7.1

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6 NYCRR 202-2.4 (a) (3)

Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

6 NYCRR 211.1

This regulation requires that 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.

6 NYCRR 212-1.5 (d)

This provision allows for the department to specify a less restrictive permissible emission rate or degree of air cleaning for the process emission source or emission point than required under Subpart 212-2 in instances where a facility owner or operator can demonstrate to the satisfaction of the department that the facility owner will apply the Best Available Control Technology (BACT) for that criteria air contaminant or the Best Available Control Technology for a toxic air contaminant (T- BACT).

6 NYCRR 212-1.5 (e) (2)

A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) satisfies the requirements of Part 212 for the respective air contaminant regulated by the Federal standard.

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However, NESHAPs regulating High Toxicity Air Contaminants (HTACs) must provide evidence that the maximum offsite ambient air concentration is less than the AGC/SGC and that emissions are less than the PB trigger for the respective air contaminant.

6 NYCRR 212-2.1 (a)

This provision is for an air contaminant listed in Section 212-2.2 Table 2 - High Toxicity Air Contaminant List (HTAC). The facility owner or operator must either limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4.

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 212-3.1 (c) (4) (i)

This provision states that owners and/or operators of emission points subject to Part 212-3 operating prior to October 20, 1994 must submit a compliance plan to the department. The compliance plan must demonstrate that the VOC emission points are equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent.

6 NYCRR 216.3

This section contains the particulate emission limitations for various confined processes in the iron and/or steel industry.

6 NYCRR 216.4

This regulation limits the opacity of emissions from iron and/or steel processes.

6 NYCRR 216.5

NO_x and VOC RACT requirements for Iron and/or Steel Processes.

6 NYCRR 226-1.3

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This section lists the general requirements for owners or operators conducting solvent cleaning processes.

6 NYCRR 226-1.4 (a)

This section describes the equipment specifications and control requirements for cold cleaners.

6 NYCRR 226-1.5 (a)

This subpart describes the operating practices required by an owner or operator conducting solvent cleaning.

6 NYCRR 228-1.1 (a) (3)

This regulation specifies that any coating line, which is or becomes subject to the requirements of this regulation, will remain subject to its requirements even if the reason they were subject later falls below the applicability threshold.

6 NYCRR 228-1.3 (a)

This regulation 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 (c)

This regulation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

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This regulation requires that owners or operators of coating operations minimize emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.4 (b) (4) (ii)

This regulation prohibits facilities that apply miscellaneous metal parts coatings and use compliant coatings as a compliance technique from using coatings with VOC contents, as applied, which exceed the limits specified in Table B4.

6 NYCRR 228-1.6 (a)

This regulation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the regulation.

6 NYCRR 228-1.6 (c)

This regulation permits Department personnel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirements.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
E-00006/-/024	40 CFR 63.11516 (f)	Nine Metal Fabrication and Finishing Area Source NESHAP - Welding Standards

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department

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has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at KENNEDY VALVE DIV MC WANE INC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

E-00006/-/015	69	work practice involving specific operations
E-00006/-/015	70	record keeping/maintenance procedures
E-00006/-/015	72	record keeping/maintenance procedures
E-00006/-/015	73	record keeping/maintenance procedures
E-00006/-/024	75	record keeping/maintenance procedures
E-00006/-/024	76	record keeping/maintenance procedures
E-00006/-/024	77	record keeping/maintenance procedures
E-00001	53	record keeping/maintenance procedures
E-00005	59	record keeping/maintenance procedures
E-00001	54	record keeping/maintenance procedures
E-00001/00088	58	intermittent emission testing
FACILITY	47	monitoring of process or control device parameters as surrogate
E-00001	55	record keeping/maintenance procedures
E-00001	56	record keeping/maintenance procedures
E-00001	57	record keeping/maintenance procedures
FACILITY	48	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
FACILITY	24	monitoring of process or control device parameters as surrogate
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	intermittent emission testing
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	work practice involving specific operations
FACILITY	81	work practice involving specific operations
FACILITY	82	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
E-00005/-/013/S0024	60	monitoring of process or control device parameters as surrogate
E-00005/00085/013	61	intermittent emission testing
FACILITY	34	monitoring of process or control device parameters as surrogate
FACILITY	35	monitoring of process or control device parameters as surrogate
FACILITY	36	intermittent emission testing
FACILITY	37	monitoring of process or control device parameters as surrogate
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	monitoring of process or control device parameters as surrogate
FACILITY	41	monitoring of process or control device parameters as surrogate
FACILITY	42	monitoring of process or control device parameters

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FACILITY	43	as surrogate
E-00006/-/015	63	work practice involving specific operations monitoring of process or control device parameters as surrogate
E-00006/-/015	64	record keeping/maintenance procedures
E-00006/-/015	66	work practice involving specific operations
E-00006/-/015	67	record keeping/maintenance procedures

Basis for Monitoring

6 NYCRR Part 201-3 Exempt and Trivial Activities

- 6 NYCRR 201-3.2 – Prior permits included a condition under this citation listing the exempt and trivial activities at the facility. To provide greater flexibility with adding exempt or trivial activities this condition has been removed as part of this renewal. The facility owner or operator must continue to keep documentation of all exempt and trivial activities as required by other conditions under this Subpart.
- 6 NYCRR 201-3.2(c)(27) – Process 007 and the sand screening system (ES S0015) were previously considered exempt from permitting under 6 NYCRR 201-3.2(c)(27) as a solid material storage vessel with appropriate emissions control. However, because this process includes screening and handling of the sand from the shakeout process – not just storage, this process does not meet this exemption. Therefore, as part of this renewal this process and S0015 have been included in the permit. This change does not reflect the addition of any equipment or processes nor an increase in emissions from the facility.

6 NYCRR Part 201-6 Title V Permits

- 6 NYCRR 201-6.5(a) – In accordance with Sections 7(2) and 7(3) of the Community Leadership and Climate Protection Act (CLCPA), the facility owner or operator submitted a CLCPA analysis on January 19, 2023 (Revised June 08, 2023) for the project. Direct, indirect, and upstream greenhouse (GHG) emissions and direct co-pollutant emissions from GHG sources were quantified. Total PTE GHG emissions are 15,811.17 tons CO_{2e}/year primarily from combustion of natural gas in permit-exempt process and space heaters (0.4 – 3.5 MMBtu/hour) at the facility.

For the purpose of the analysis, the “project” is the renewal of the facility ATV permit and considers total facility GHG emissions. This renewal also adds new 6 NYCRR Part 212 and T-BACT requirements to reduce benzene emissions including a reduction in the facility iron melting limit from 75,000 tpy to 65,000 tpy (see detailed discussion below). Accordingly, the reduced iron melting limit incorporated to comply with T-BACT (and other requirements) will likewise reduce emissions of criteria pollutants, GHGs, and co-pollutants. Based on the analysis, this revised limit and other operational restrictions incorporated to comply with 6 NYCRR Part 212 will result in a reduction in potential GHG emissions of approximately 400 tons CO_{2e} per year and a reduction in potential aggregate co-pollutant emissions of approximately 10 tons per year.

As demonstrated in the CLCPA analysis, no additional mitigation methods were determined to be economically or technically feasible as part of this project.

6 NYCRR Part 201-7 Air Title V Permits

- 6 NYCRR 201-7.1 – To cap-out of the major source NESHAP for Iron and Steel Foundries (40 CFR 63, Subpart EEEE), facility level emission caps are included to limit speciated and total hazardous air pollutant (HAP) emissions below 10 tons per year and 25 tons per year, respectively. These emissions caps were included in prior permits and have been retained as part of this renewal. Please note that the capping conditions in prior permits included specific emissions factors to be used in the calculation of

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HAP emissions from the pouring, cooling, and shakeout processes. These specific emission factors were not facility specific and potentially outdated, and therefore have been removed from the capping conditions. The existing emissions caps for total and individual HAPs have been lowered slightly as part of this renewal (from 24.9 and 9.9 tpy to 24.5 and 9.5 tpy, respectively) to account for any variability and provide a larger buffer to prevent accidental exceedance of major source thresholds.

Prior permits also contained a 75,000 tons metal melted per year cap under this provision to limit HAP emissions below major source thresholds. Since this limit has been superseded by the 65,000 tpy limit under 6 NYCRR Part 212 below and is redundant with the caps above, it has been removed from the permit.

6 NYCRR Part 211 General Prohibitions

- 6 NYCRR 211.2 – No specific monitoring is included under this citation since facility processes are subject to specific opacity limits/monitoring under other regulations.

6 NYCRR Part 212 General Process Emission Sources

- 6 NYCRR 212-1.6 (a) – Limits visible emissions from process sources to a maximum of 20% opacity. More stringent or equivalent opacity limits are applicable to facility process sources under 40 CFR 63, Subpart ZZZZZ, 6 NYCRR Part 216, or 6 NYCRR Subpart 228-1. Therefore, for permit streamlining, no opacity conditions have been included under this citation for processes subject to these rules.

Please note that the GMAW Welding Machine (E-00006, Process 024) is subject to this requirement. However, this process does not have a dedicated emission point, is equipped with particulate controls, and does not emit to the outdoor air. Therefore, no monitoring condition for this citation has been included for this process.

- 6 NYCRR 212-1.5(d) – Processes 001-008 are subject to 6 NYCRR Part 216 – *Iron and/or Steel Processes* since they are “commonly associated with or necessary to production of iron...” (see 6 NYCRR 216.1(e)). At the time of the renewal application submission, processes subject to Part 216 were exempt from the requirements of 6 NYCRR Part 212. In the interim, this exemption has been revised such that processes subject to Part 216 are exempt from Part 212 *only with respect to emissions not given an A-rating* (see 6 NYCRR 212-1.4(k)).

Additionally, Processes 001-013 are subject to 40 CFR 63, Subpart ZZZZZ – *NESHAP for Iron and Steel Foundries Area Sources*. This NESHAP regulates particulate, opacity, and metal HAP emissions (i.e., antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, and selenium) from foundry operations (mold or core making and coating; scrap handling and preheating; metal melting and inoculation; pouring, cooling, and shakeout; shotblasting, grinding, and other metal finishing operations; and sand handling.) Therefore, per 6 NYCRR 212-1.5(e)(2), for Processes 001-013 compliance with Part 212 for particulates and metal HAP is demonstrated by complying with NESHAP Subpart ZZZZZ, and for HTACs either meeting the Mass Emission Limit (MEL) in Table 2 of 6 NYCRR 212-2.2 or providing a Toxic Impact Assessment (TIA) demonstrating compliance with the AGC/SGC in *DEC Program Policy DAR-1*.

Although not subject to Part 212 at the time of the renewal, the Department requested that the facility evaluate the impacts of High Toxicity Air Contaminants (HTACs) in a letter dated February 5, 2020.

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An air modeling protocol was submitted on March 29, 2021 and approved by the Department in a letter dated May 5, 2021. A Part 212 analysis and air modeling report for was submitted to the Department on September 30, 2022.

Per this report, processes 002-008 and 011-013 emit the following HTACs under 6 NYCRR 212-2.2 which have been assigned an Environmental Rating of A by the Department: Acetaldehyde, Aniline, Arsenic, Benzene, Beryllium, Cadmium, Chromium, Formaldehyde, Lead, Manganese, Mercury, Nickel, and Vanadium. Per the requirements of 6 NYCRR 212-2.1(a), process operations that emit HTACs must either meet the air cleaning requirements in 6 NYCRR 212-2.3(b) or comply with the Mass Emission Limit (MEL) under 6 NYCRR 212-2.2. Please note that emissions from Process 001 (i.e., scrap preheating) are from the combustion of natural gas and therefore this process is exempt from Part 212.

Based on the revised emissions calculations provided with the air modeling report, emissions of the following HTACs are below their respective MELs and in compliance with the requirements of Part 212: Acetaldehyde, Aniline, Arsenic, Beryllium, Cadmium, Chromium, Formaldehyde, Mercury, Nickel, and Vanadium. Conversely, emissions of Benzene, Manganese, and Lead exceeded their respective MELs.

Manganese and Lead are metal HAPs regulated by NESHAP Subpart ZZZZZ. Therefore, per 6 NYCRR 212-1.5(e)(2) above, the facility must demonstrate compliance with their respective AGC/SGC in DAR-1. Please note that annual lead emissions are less than the PB Trigger in Table 2 of 6 NYCRR 212-2. The air modeling report showed that off-site impacts of Manganese and Lead are less than the applicable AGC/SGC and therefore in compliance with the requirements of Part 212.

Since Benzene is not regulated by an applicable NESHAP, the facility must demonstrate compliance with the air cleaning requirements under 6 NYCRR 212-2.3(b). Based on the air modeling report, off-site impacts of benzene exceeded the AGC/SGC and the minimum level of control in Table 2 was not able to be met. Therefore, the facility was required to prepare and submit a T-BACT analysis per 6 NYCRR 212-1.5(d) for Benzene emissions from the pouring, cooling, and shakeout processes (004, 005, 006). The air modeling report methods and findings were approved by the Department on November 11, 2021.

A T-BACT analysis for Benzene was completed in accordance with the procedures in DAR-1 and a report submitted to the Department on May 13, 2022. Supplemental information for the T-BACT was provided on September 30, 2022 and January 19, 2023 in response to Department comments.

Please note that although Process 001 is exempt from Part 212, benzene emissions from this process were included in the September 2021 air modeling report and the cumulative risk analysis in the T-BACT analysis. Process 011 also emits minimal amounts of benzene from the combustion of natural gas in a heater used for process heat. Since these emissions are combusted related, they are exempt from the requirements of Part 212. Additionally, the heater does not have a dedicated emission point and vents as fugitive back into the facility. Modeling of fugitives is generally not practicable and therefore, the benzene emissions from Process 011 were not included in the air modeling or T-BACT cumulative impact assessment.

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The Department has reviewed the T-BACT analysis and concluded that the facility has demonstrated that the maximum degree of emissions control is being applied. The T-BACT analysis was approved by the Department via letter on July 12, 2023. The T-BACT analysis and the Department's determination are contingent on the following:

- Reducing the annual metal melt limit from 75,000 tons per year to 65,000 tons per year; and
- Constructing a new combined exhaust system and stack for the pouring and cooling processes (004 and 005).

Therefore, T-BACT for emissions of Benzene from the pouring, cooling, and shakeout processes is limiting the annual quantity of metal melted and for the construction of the new stack and exhaust system. Additionally, following construction of the new stack, the Department is requiring the facility to conduct emissions testing to determine the benzene emission rate and reevaluate the T-BACT analysis if necessary. Multiple monitoring conditions are included in the permit under 6 NYCRR 212-1.5(d) consistent with the Department's T-BACT determination. The stack testing condition limit is based on the combined PTE benzene emission rate from the pouring, cooling, and shakeout processes.

For HTACs that have annual actual emissions below their MELs, compliance is assured through limiting the annual metal melt production listed above, proper operation of controls, and compliance with an applicable NESHAP, as specified elsewhere in the permit. The facility must also monitor, record, and report actual facility HAP emissions in accordance the emission capping conditions under 6 NYCRR 201-7.1. Therefore, no additional specific monitoring included for these contaminants under this citation. A recordkeeping/reporting condition is included requiring certification that emissions are below their respective MELs on an annual basis.

For Manganese and Lead, a recordkeeping condition is included requiring the facility owner or operator keep records of modeling (and supporting calculations.) Modeling will be reconducted upon permit renewal or modification.

Additionally, a monitoring condition has been included limiting annual throughput for the sand handling, screening, and storage system (Emission Source S0015) to 325,000 tons per year consistent with the supporting inputs used in the latest calculations/modeling.

- 6 NYCRR 212-1.5(e) – Per the exemption under 6 NYCRR 212-1.5(e), a process source subject to a NESHAP satisfies the requirements of Part 212 for the respective air contaminant regulated by the Federal standard by demonstrating compliance with the standard, and for Federal standards regulating HTACs, also providing a Toxic Impact Assessment (TIA) demonstrating compliance with the AGC/SGC in *DEC Program Policy DAR-1*.

The surface coating process under Process 015 is subject to 40 CFR 63, Subpart M MMM – *NESHAP for Surface Coating of Misc. Metal Parts and Products*. Requirements for this process under 40 CFR 63, Subpart M MMM are included which regulate organic HAP emissions from this process. Non-criteria air contaminant emissions from this process include cumene, ethyl benzene, toluene, xylenes which are all organic HAPs. This process does not emit HTACs. Therefore, Process 015 satisfies the requirements of Part 212 by complying with Subpart M MMM and no additional Part 212 conditions are included for this process. Associated conditions are included for 40 CFR 63, Subpart M MMM an discussed below.

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The gas metal arc welding process under Process 024 is subject to 40 CFR 63, Subpart XXXXX–*NESHAP for Nine Metal Fabrication and Finishing Source Categories at Area Sources*. Requirements for this process under 40 CFR 63, Subpart XXXXXX are included which regulate metal fabrication HAP (MFHAP) which consists of any of the following metals: cadmium, chromium, lead, manganese, or nickel. Process 024 is equipped with a cartridge filter to control metal HAP emissions and exhausted back into the facility.

Process 024 potentially emits chromium, cobalt, manganese, and nickel which are all listed as HTACs. Per 6 NYCRR 212-1.5(e), Process 024 complies with the requirements of Part 212 by complying with Subpart XXXXXX and demonstrating compliance with the applicable AGCs/SGCs or MELs for the emitted HTACs. Emissions of chromium, cobalt, manganese, and nickel were addressed in the Part 212 analysis and air modeling report dated September 30, 2021. As discussed above, this report demonstrated compliance with the MELs or SGCs/AGCs for these contaminants.

Emissions from Process 024 are exhausted back into the building after control and are not anticipated to be emitted to the outdoor air. Modeling of fugitive emissions is generally not practicable and therefore, emissions from this process were not included in the emissions totals and/or air modeling in the above report. Additionally, the process is already equipped with a control device expected to achieve the degree of air cleaning required for A-rated non-criteria air contaminants emitted at a rate of less than 1 lbs/hour (90%). Based on the above, Process 024 satisfies the requirements of Part 212 by complying with the requirements of 40 CFR 63, Subpart XXXXXX. Therefore, no additional Part 212 conditions are included for this process. Associated conditions are included for 40 CFR 63, Subpart XXXXXX.

- 6 NYCRR 212-2.3(b) – The PUCB (Isocure) core making machines (Process 013) are subject to the air cleaning requirements under 6 NYCRR Part 212-2.3(a) for N,N-Dimethylpropylamine and N,N-Dimethyl-2-Propanamine. These contaminants have been assigned an Environmental Rating of “B” by the Department and have an ERP less than 10 pounds per hour and therefore must meet their respective guideline concentrations under DEC Program Policy DAR-1. However, this process is equipped with a wet scrubber (Control S0024) that has a minimum control efficiency of 90% which meets the maximum degree of air cleaning required for B-rated contaminants. Therefore, compliance with Part 212 is met through operation and monitoring of the wet scrubber. Monitoring conditions from prior permits have been retained in this Renewal to ensure the scrubber is operated properly and the minimum control efficiency is achieved.

Please note that this process also has emissions of the following non-HTACS: Phenol and naphthalene. The actual annual process emission rate of these contaminants is less than 100 lbs/year. Therefore, per Paragraph V.A.2 of DEC Program Policy DAR-1, no air modeling is required to demonstrate compliance with the guideline concentrations. Therefore, this process is in compliance with Part 212 for these contaminants.

- 6 NYCRR 212-3.1 – The facility has PTE VOC emissions greater than 50 tpy and is therefore, process emissions sources 001-013 and 015 are tentatively subject to VOC RACT under this Subpart.

As discussed above, Processes 001-008 are subject to 6 NYCRR Part 216 and Process 015 is subject to 6 NYCRR Part 228. These processes are exempt from the requirements of Part 212 with respect to emissions that are not given an A-rating per 6 NYCRR 212-1.4(k) and (l), respectively. Individual air contaminants, as a component of total VOCs, emitted by these processes that have been assigned A-

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rating are regulated under 6 NYCRR Subpart 212-2 and discussed above. Therefore, since these processes are generally exempt from Part 212, they are exempt from the control requirements under 6 NYCRR Subpart 212-3 VOC RACT.

Processes 011 and 012 are subject to 6 NYCRR Part 212 and have emissions of VOCs. Uncontrolled PTE VOC emissions from these processes are less than 3 lbs/hour and actual VOC emissions are less than 15 lbs/day, therefore, VOC RACT does not apply to these processes. Please note that these processes consist of multiple sources which are not vented to an emission point and exhaust into the building as fugitive. However, for the purposes of this applicability determination it is assumed that the emissions from each source is combined into a single stream.

Process 013 vents to EP 00085 is subject to 6 NYCRR Part 212 and has actual uncontrolled VOC emissions greater than 15 lbs/day. Therefore, this process and emission point must be the control requirements for VOC RACT under 6 NYCRR 212-3.1(c)(4). As noted above, this process is equipped with a wet scrubber (Control S0024) for compliance with 6 NYCRR 212-2.3(b) for emissions of N,N-Dimethylpropylamine and N,N-Dimethyl-2-Propanamine. A monitoring condition is included under this citation requiring that the facility conduct stack testing to demonstrate whether the existing wet scrubber meets the 81% control requirement for VOC RACT. If the 81% control requirement cannot be met, the facility must submit a VOC RACT analysis to evaluate the feasibility of additional controls or process changes for this process to meet Part 212 VOC RACT requirements.

6 NYCRR Part 216 Iron and/or Steel Processes

- 6 NYCRR 216.3 – This monitoring condition ensures proper operation of control devices through continuous monitoring of the pressure drop range across the device. Prior permits included separate monitoring conditions for Control S0088 and S0090. Since the monitoring method and limits were identical, these have been combined into a single condition as part of this renewal. The pressure drop range is evaluated as part of the once every five year stack testing required to demonstrate compliance with the limit.
- 6 NYCRR 216.3 – Limits PM emissions from subject emission points. To comply with this limit, this monitoring condition requires a Method 5 emissions test once per permit term for each affected emission point. The frequency of periodic testing is justified since the emission sources/points utilize PM control devices and are therefore not anticipated to exceed the applicable limit. Prior permits included this limit as separate conditions for each subject process/emission point. As part of this renewal this limit has been consolidated into a single monitoring condition.
- 6 NYCRR 216.4 - This condition specifies the monitoring and recordkeeping to ensure compliance with the 20 percent opacity emissions limit. This monitoring condition ensures compliance with this limit through daily visual observations. The daily monitoring frequency for visual observations is justified because the rule does not specify a monitoring frequency and the condition requires performance of a Method 9 test if visible emissions are observed during two consecutive visual observations.
- 6 NYCRR 216.5 – Iron and/or steel processes located at major sources of VOC emissions are subject to case-by-case VOC RACT per 6 NYCRR 216.5. Emissions Processes 001-008 are subject to Part 216 and the facility is a major source of VOC emissions. Processes 001-006 emit VOCs and therefore, these processes must meet case-by-case VOC RACT and must submit a RACT analysis upon permit

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renewal or modification. There is currently no add-on controls for VOC emissions from iron and/or steel processes.

As discussed above, the facility submitted a T-BACT analysis for emissions of benzene from the pouring cooling, and shakeout processes (Processes 004-006) as part of this renewal. Benzene controls were determined to be technically or economically infeasible. The control methods, efficiencies, and costs are equivalent or functionally similar for VOC and benzene control. Therefore, based on the facility VOC emissions and the control cost information presented in T-BACT analysis, the Department has determined that VOC control is not anticipated to be technically or economically feasible for these processes.

A monitoring condition has been included requiring submission of a case-by-case VOC RACT analysis evaluating the feasibility of VOC controls upon modification or renewal. This analysis may be combined with the T-BACT reevaluation following construction of the new pouring, cooling, and shakeout stack.

6 NYCRR Part 226 Solvent Cleaning Processes

- 6 NYCRR 226-1 – The facility operates several remote reservoir cold cleaning parts washers which are exempt from permitting per 6 NYCRR 201-3.3(c)(49). However, these parts washers are still subject to requirements under 6 NYCRR Subpart 226-1. Facility-level conditions for the applicable work practice and monitoring requirements are included for this subpart.

6 NYCRR Part 228-1 Surface Coating Operations

- 6 NYCRR 228-1.3(a) – This condition specifies the monitoring and recordkeeping to ensure compliance with the 20 percent opacity emissions limit. The daily monitoring frequency is justified because the rule does not specify a monitoring frequency and visible emissions from subject sources are not expected to cause exceedances. Properly operated spray coating operations that use these materials are unlikely to produce visible emissions.
- 6 NYCRR 228-1.4(b)(4)(ii) – Requires that “extreme performance coatings” used in surface coating operations contain, as applied, minus water and excluded compounds, no more than 3.5 pounds of VOCs per gallon. This monitoring condition ensures compliance with these limits through recordkeeping and/or analysis of the fountain solutions.
- 6 NYCRR 228-1.6(a) – Specifies that testing of surface coatings subject to 6 NYCRR Subpart 228-1 may be performed upon the request of the Department. This monitoring condition ensures compliance with VOC content limits through intermittent emissions testing.

40 CFR 63, Subpart EEEE Major Source Iron and Steel Foundries NESHAP

- 40 CFR 63.3280 – The facility is an area source of HAP emissions and therefore not subject to this Subpart.

40 CFR 60, Subpart IIII Stationary Spark Ignition Internal Combustion Engine NSPS

- The facility owns and operates two diesel-fired emergency generators which are exempt from permitting per 6 NYCRR 201-3.2(c)(6) and that are subject to 40 CFR 60, Subpart IIII. These exempt sources continue to be referenced in the permit description and emission unit description. Per manufacturer documentation engines are 40 CFR 60, Subpart IIII Tier 3 certified. Purchase and installation dates are 2010 (EPA Cert. VEX-STNRCI-10-11) and 2013 (EPA. Cert. DFPXL06.7DGS-

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005). The facility owner or operator must comply with the applicable requirements of 40 CFR 60, Subpart IIII to these engines.

- The Department has not accepted delegation of 40 CFR 60, Subpart IIII. Therefore, a single general condition regarding the applicability of this Subpart is included at the facility-level.

40 CFR 63, Subpart MMMM Surface Coating of Misc. Metal Parts and Products NESHAP

- 40 CFR 63.3890(b)(1) – Limits organic HAP emissions to 0.31 kg per liter of coating solids on a 12-month rolling-basis. The facility demonstrates compliance by meeting the requirements of the *Emission rate without add-on controls option* and meeting the monitoring requirements that are specified in a separate monitoring condition under 40 CFR 63.3891(b).
- 40 CFR 63.3891(b) – This condition specifies the monitoring and recordkeeping to ensure compliance with the organic HAP emissions limit under 40 CFR 63, Subpart MMMM. This monitoring condition ensures compliance with this limit through a monthly determination of the organic HAP emission rate from surface coating processes which is incorporated into a 12-month rolling total. The monitoring methods and frequency are consistent with the requirements under the provisions of 40 CFR 63, Subpart MMMM.
- 40 CFR 63.3910(c) – An initial Notification of Compliance Status report is required under the provisions of 40 CFR 63, Subpart MMMM. This requirement has already been completed and therefore, for permit streamlining, is not included in the permit.
- 40 CFR 63.3950 – Requires an initial compliance demonstration with the organic HAP emissions limit under 40 CFR 63, Subpart MMMM. This monitoring condition ensures compliance with this limit through determining the organic HAP emission rate from surface coating processes during the initial 12-month compliance period. This requirement has already been completed and therefore, for permit streamlining, is not included in the permit.

40 CFR 63, Subpart ZZZZ Reciprocating Internal Combustion Engine NESHAP

- The facility owns and operates two emergency generators which are exempt from permitting per 6 NYCRR 201-3.2(c)(6) and that is subject to 40 CFR 60, Subpart IIII. Per 40 CFR 63.6590(c), the engines meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. Therefore, no conditions are included for this Subpart.

40 CFR 63, Subpart ZZZZZ Area Source Iron and Steel Foundries NESHAP

- 40 CFR 63.10895(c)(1) – Limits emissions of particulates from metal melting furnaces at existing iron and steel foundries to 0.8 pounds of particulate per ton metal charge. The facility has chosen to comply with this limit in lieu of the metal HAP limit for existing furnaces under this citation. This monitoring condition ensures compliance with these limits through intermittent emissions testing per 40 CFR 63.10898(a). The frequency of testing is consistent with the applicable requirements under 40 CFR 63.10898(b).
- 40 CFR 63.10895(e) - This condition specifies the monitoring and recordkeeping to ensure compliance with the 20 percent opacity emissions limit for fugitive emissions from affected iron and steel foundry operations. This monitoring condition ensures compliance with this limit through semi-annual Method 9 or Method 22 opacity tests per the frequency under 40 CFR 63.10898(h)&(i) and the requirements under Table 1 to 40 CFR, Subpart ZZZZZ and 40 CFR 63.6(h). This monitoring condition replaces the condition for this regulatory citation from the prior permit which required daily visible emissions monitoring and was not consistent with the requirements of 40 CFR 63, Subpart ZZZZZ. The prior monitoring condition for this regulatory citation has been removed because the monitoring

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requirements overlapped with other conditions in this permit and additional monitoring beyond that specified by the rule is not considered necessary.

- 40 CFR 63.10896(a) – Requires operation of control devices for affected sources to be operated in accordance with a written operations and maintenance plan. This monitoring condition ensures compliance with these limits through work practice and recordkeeping requirements.
- 40 CFR 63.10897(a)(1) – Requires an initial and periodic inspections of PM control devices for melting furnaces at affected iron and steel foundries to ensure proper device operation. Monitoring frequency for periodic inspections is monthly and semi-annually for exterior and interior inspections, respectively. Compliance with this requirement is demonstrated through monitoring and recordkeeping per the methods and frequency requirements under the provisions of 40 CFR 63, Subpart ZZZZZ.
- 40 CFR 63.10897(d) – Requires installation, operation, and maintenance of a certified, bag-leak detection device on baghouses at affected iron and steel foundries to ensure proper device operation. This monitoring condition ensures compliance through a written operations and maintenance plan, monthly inspections, and recordkeeping requirements.

40 CFR 63, Subpart XXXXXX Area Source NESHAP for Nine Metal Fabrication and Finishing Source Categories

- 40 CFR 63.11514(b)(4) – Facility surface coating operations do not use coatings containing a metal fabrication HAP (MFHAP). Therefore, per this applicability citation, they are not subject to the requirements of 40 CFR 63, Subpart XXXXXX.
- 40 CFR 63.11516(f) – This condition specifies the management practices or fume control measures applicable to welding operations that use MFHAPs. Applicability is determined through monthly monitoring of annual welding rod usage per the requirements under 40 CFR 63, Subpart XXXXXX. Facility usage of welding rod containing a MFHAP will not exceed 2,000 pounds per year. Therefore, the facility is not subject to the management practices under 40 CFR 63.11516(f)(3)-(8).

A recordkeeping and maintenance condition is included to meet the limited exemption above and the applicable management practices for this process under 40 CFR 63.11516(f)(1)&(2).

- 40 CFR 63.11519(a) – An initial Notification of Compliance Status report is required under the provisions of 40 CFR 63, Subpart XXXXXX. This requirement has already been completed and therefore, for permit streamlining, is not included in the permit.

40 CFR 64 Compliance Assurance Monitoring

- 40 CFR Part 64 – The following emission units/points are tentatively subject to CAM since (1) they have pre-control potential emissions of particulates greater than 100 tons per year, (2) are subject to a particulate emission standard, and (3) demonstrate compliance with the emissions standard through add-on control devices: Emission Unit E-00001 (EP 00088) and Emission Unit E-00003 (EP 00089).

These emission units/points are subject to the following particulate emission limits specified in monitoring conditions in this permit:

- 6 NYCRR 216.3 – 0.05 gr/dscf: EP 00088, EP 00089

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- 40 CFR 63, Subpart ZZZZZ – 0.8 lbs/ton: EP 00088

40 CFR 63, Subpart ZZZZZ was originally proposed on September 17, 2007. Therefore, EP 00088 is subject to a NESHAP proposed after November 15, 1990, it is exempt from CAM for this limit per 40 CFR 64.2(b)(1)(i).

Per 40 CFR 64.2(b)(1)(vi), emissions limitations or standards where continuous monitoring is required by the ATV permit are not subject to CAM. As discussed under 6 NYCRR 216.3 above, a monitoring condition is included for the particulate controls (Control IDs S0088, S0089, and S0090) requiring continuous monitoring of pressure drop across the baghouses to ensure adequate operation and control. This pressure limit/range is established for each baghouse based on the initial stack test and is be reevaluated during subsequent testing (required once every five years.) Therefore, because a continuous compliance determination method is specified in the permit for the baghouses which is directly correlated with the emissions verified during testing, these emission units/points are exempt from CAM for particulates per 40 CFR 64.2(b)(1)(vi).

Please note that although the pouring and cooling process (Emission Unit E-00002: EPs 00067, 00068, 00069, 00090, 00091, and 000PC) is subject a particulate limit, it does not use add-on particulate controls. Therefore, it does not meet the criteria for CAM applicability and is not subject to requirements under this Part.

Each Emission Unit either does not have pre-control VOC emissions greater than 50 tons per year or does not use add-on VOC control are not used to demonstrate compliance with an emissions standard. Therefore, this emission unit is not subject to CAM for VOC.