New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 8-0704-00025/00059
Renewal Number: 1
Modification Number: 1 02/06/2017

Facility Identification Data
Name: KENNEDY VALVE DIV MC WANE INC
Address: 1021 E WATER ST
ELMIRA, NY 14901

Owner/Firm
Name: MCWANE INC
Address: 2900 US RTE 280
BIRMINGHAM, AL 35223, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: ROBERT B CALL
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Avon, NY 14414
Phone: 5852265396

Division of Air Resources:
Name: THOMAS G WICKERHAM
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AVON, NY 14414-9519
Phone: 5852265319

Air Permitting Contact:
Name: MICHAEL BOWLES
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1021 E WATER ST
ELMIRA, NY 14901
Phone: 6077342211

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

Summary Description of Proposed Project
This minor permit modification application is to add minimum and maximum pressure drop parameters (in inches of water) as requirements for the roof vent baghouse (S0090) as outlined under existing condition 43 of the facility Title V permit; which must be established and approved by the Department using an
application for modification of the existing Title V permit within one hundred and twenty (120) days of installation.

In addition to some minor clerical changes, a change of contaminants (replacing the catalyst dimethylisopropylamine with dimethylpropylamine) in the mold-making process (012) was made under the existing operational flexibility protocol and is now being incorporated into the permit.

### 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.)

<table>
<thead>
<tr>
<th>Criteria Pollutant</th>
<th>Attainment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM)</td>
<td>ATTAINMENT</td>
</tr>
<tr>
<td>Particulate Matter ≤10µ in diameter (PM10)</td>
<td>ATTAINMENT</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO2)</td>
<td>ATTAINMENT</td>
</tr>
<tr>
<td>Ozone*</td>
<td>TRANSPORT REGION (NON-ATTAINMENT)</td>
</tr>
<tr>
<td>Oxides of Nitrogen (NOx)**</td>
<td>ATTAINMENT</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>ATTAINMENT</td>
</tr>
</tbody>
</table>

* 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 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 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 - Resin coated sand is purchased in large tote bags and transferred as needed into hoppers over ten shell core 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 - Uncoated sand is metered into a single core machine 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 Building D - Uncoated sand is pneumatically conveyed into three 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 an oven associated with each machine (3 ovens).

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):

00088  
Process: 001 is located at MELT DEPARTMENT, Building F -

Process: 002 is located at MELT DEPARTMENT, Building F -

Process: 003 is located at MELT DEPARTMENT, Building F -

Emission unit E00006 - Finishing: After castings are cleaned are coated using spray or powder coating processes.

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

00056, 00060
Process: 015 is located at Building H - Castings requiring custom paint are painted in two spray booths each with a dry filter and exhaust fan.

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 - 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.

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

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
Process: 004 is located at POURING LINE, Building E - 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 - Sand molds containing molten iron are conveyed in cars on moving rollers while the iron solidifies.

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:
Kennedy Valve is subject to Title V permitting requirements. This facility became major when new emission factors demonstrated that emissions of carbon monoxide from the pouring operations might exceed the 100 tons per year major source threshold.

Program Applicability
The following chart summarizes the applicability of KENNEDY VALVE DIV MC WANE INC with regards to the principal air pollution regulatory programs:
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<table>
<thead>
<tr>
<th>Regulatory Program</th>
<th>Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSD</td>
<td>NO</td>
</tr>
<tr>
<td>NSR (non-attainment)</td>
<td>NO</td>
</tr>
<tr>
<td>NESHAP (40 CFR Part 61)</td>
<td>NO</td>
</tr>
<tr>
<td>NESHAP (MACT - 40 CFR Part 63)</td>
<td>YES</td>
</tr>
<tr>
<td>NSPS</td>
<td>NO</td>
</tr>
<tr>
<td>TITLE IV</td>
<td>NO</td>
</tr>
<tr>
<td>TITLE V</td>
<td>YES</td>
</tr>
<tr>
<td>TITLE VI</td>
<td>NO</td>
</tr>
<tr>
<td>RACT</td>
<td>NO</td>
</tr>
<tr>
<td>SIP</td>
<td>YES</td>
</tr>
</tbody>
</table>

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

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

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAA) 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 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC’s and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

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

Compliance Status
Facility is in compliance with all requirements.

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

<table>
<thead>
<tr>
<th>SIC Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3321</td>
<td>GRAY IRON FOUNDRIES</td>
</tr>
<tr>
<td>3491</td>
<td>INDUSTRIAL VALVES</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>SCC Code</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>3-04-003-03</td>
<td>SECONDARY METAL PRODUCTION</td>
</tr>
<tr>
<td>3-04-003-03</td>
<td>SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES</td>
</tr>
<tr>
<td></td>
<td>Electric Induction Furnace</td>
</tr>
<tr>
<td>3-04-003-20</td>
<td>SECONDARY METAL PRODUCTION</td>
</tr>
<tr>
<td>3-04-003-20</td>
<td>SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES</td>
</tr>
<tr>
<td></td>
<td>Pouring/Casting</td>
</tr>
<tr>
<td>3-04-003-25</td>
<td>SECONDARY METAL PRODUCTION</td>
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<tr>
<td>3-04-003-25</td>
<td>SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES</td>
</tr>
<tr>
<td></td>
<td>Castings Cooling</td>
</tr>
<tr>
<td>3-04-003-31</td>
<td>SECONDARY METAL PRODUCTION</td>
</tr>
<tr>
<td>3-04-003-31</td>
<td>SECONDARY METAL PRODUCTION - GREY IRON FOUNDRIES</td>
</tr>
</tbody>
</table>
Facility Emissions Summary

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

<table>
<thead>
<tr>
<th>Cas No.</th>
<th>Contaminant</th>
<th>PTE lbs/yr</th>
<th>PTE tons/yr</th>
<th>Actual lbs/yr</th>
<th>Actual tons/yr</th>
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</thead>
<tbody>
<tr>
<td>000108-38-3</td>
<td>1,3 DIMETHYL BENZENE</td>
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<tr>
<td>000090-12-0</td>
<td>1-METHYLNAPHTHALENE</td>
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<td>000098-86-2</td>
<td>1-PHENYLETHANONE</td>
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<td>000091-57-6</td>
<td>2-METHYL NAPHTHALENE</td>
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<td>2-METHYL PHENOL</td>
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<td>000996-35-0</td>
<td>2-PROPANAMINE, N,N-DIMETHYL</td>
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<tr>
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<td>ARSENIC</td>
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</tbody>
</table>
NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A:  Emergency Defense - 6 NYCRR 201-1.5
An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

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

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

Item B: 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 C: 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 D: 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 E: 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 F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: 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 H: 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 I: 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 J: 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 K: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 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 L: 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 M: 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: 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

<table>
<thead>
<tr>
<th>Location</th>
<th>Regulation</th>
<th>Condition</th>
<th>Short Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>FACILITY</td>
<td>ECL 19-0301</td>
<td>64</td>
<td>Powers and Duties of the Department with respect to air pollution control</td>
</tr>
<tr>
<td>E-00006</td>
<td>40CFR 63-MMM.3890(b)</td>
<td>56</td>
<td>Misc. Metal Parts &amp; Products Surface Coating NESHAP - Emission Limits - Existing General Use Coating</td>
</tr>
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<td>E-00006</td>
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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
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.
6 NYCRR 201-6.4 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

6 NYCRR 201-6.4 (d) (5)
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 201-6.4 (f) (6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

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

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

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

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

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

40 CFR Part 68
This Part lists the regulated substances and 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 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)
Use Of Scrap That Does Not Contain Motor Vehicle Scrap. 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)
Particulate Matter Emission Limit For Existing Large Iron And Steel Foundries.
40 CFR 63.10895 (e)
Fugitive Emission Requirements For Large Iron And Steel Foundries. Fugitive emissions limit of 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)

40 CFR 63.10897 (d)
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 63.3890 (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 requirement 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 63.3910 (c)
This regulation describes the requirements for the content and submittal of notifications of initial compliance.

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 63.3950

6 NYCRR 201-3.2
This section describes the proof of eligibility criteria for determining whether an activity is exempt from the requirement to obtain an air permit or registration. It also provides the list of specific activities which are exempt.

6 NYCRR 201-6.4 (f) (2)

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 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 212-2.3 (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 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 condition sets the opacity requirements for the facility.

6 NYCRR 228-1.1 (a) (3)
Summary of monitoring activities at KENNEDY VALVE DIV MC WANE INC:

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Basis for Monitoring

Condition 5: 40 CFR 70 and 6NYCRR Part 201-6 require semiannual reporting of the status of all monitoring conditions.

Condition 6: 40 CFR 70 and 6NYCRR Part 201-6 require submittal of an Annual Compliance Report.

Condition 7: 6NYCRR Part 202 requires an Annual Emission Statement to be filed.

Condition 24: 6NYCRR Part 201-6.4(f)(2) This condition gives the facility the capability to make certain changes (operational flexibility) that will not require a permit modification as long as a protocol is met.

Condition 26: 6NYCRR Part 201-7.1 In order to monitor HAP emissions, records must be kept based upon calculations using the listed emission factors and methods.

Condition 27: 6NYCRR Part 201-7.1 As part of the cap on Hazardous Air Pollutants (HAPs), the annual tonnage of iron melted is restricted to 75,000 tons.

Conditions 30, 33, 51 & 68: Opacity from sources is limited to 20%. This must be monitored by a daily check of the facility for any visible emissions.

Condition 36: Motor vehicle scrap may not be used at this facility. These conditions describe the specifications, recordkeeping, reporting and certification necessary to comply with that requirement.
Condition 37, 38 and 39: These conditions outline the procedures for emissions capture, inspection and monitoring of the control devices in Emission Unit E-00001.

Conditions 41, 42, 1-1 & 1-2: To assure the proper operation of the particulate control devices in Emission Unit E-00001 for emission point 00088, a pressure drop range across each the two baghouses must be determined and monitored.

Condition 44: An initial stack test and one each permit term is required to verify that the 6NYCRR Part 216 particulate limit of 0.05 grains per standard cubic foot is met at emission point 00088.

Condition 45: 40 CFR 63 Subpart ZZZZZ requires that a particulate limit of 0.8 pounds of particulate matter per ton of metal charged be met at emission point 00088. Stack testing was previously conducted verifying this limit and further testing will be required once each 5-year permit term.

Condition 47: To assure the proper operation of the particulate control device in Emission Unit E-00003 for emission point 00088, a pressure drop range across the two baghouse must be determined and monitored.

Conditions 46 & 49: Methanol is not to be used in the catalyst formulation for any furfuryl alcohol warm box mold or core making lines at this facility.

Condition 40: An operation and maintenance plan must be prepared and a leak detection system installed for the control devices in Emission Unit E-00001 in order to assure compliance with the particulate, opacity and metal HAP emission limits for Emission Point 00088.

Condition 48: 6NYCRR Part 216 requires that the particulate limit of 0.05 grains per cubic foot be met at emission point 00089. Since stack testing was previously conducted verifying this limit, further testing will be required at the discretion of the Department.

Conditions 50, 52, 54, & 63: Under 6NYCRR Part 228, no coatings may be used that have a VOC content greater than 3.5 pounds per gallon. Handling, storage and recordkeeping procedures are specified.

Conditions 56, 57, 59, 60 and 62: Under 40 CFR 63 Subpart MMMM, emissions of organic, hazardous air pollutants (HAPs) from coating operations is limited to 0.31 kg of organic HAPs per liter of coating solids (2.6 lb/gal). These conditions describe the methods of recordkeeping and reporting to assure compliance with this limit.
Condition 1-3: To assure proper operation of the acid scrubber in maintaining compliance with 6NYCRR Part 212, the pH must be monitored.

Condition 1-4: This condition assigns a rating and emissions limit required under 6NYCRR Part 212.