



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-0603-00023/02001
Mod 0 Effective Date: 06/13/2006 Expiration Date: No expiration date.
Mod 1 Effective Date: 07/22/2010 Expiration Date: No expiration date.
Mod 2 Effective Date: 10/14/2011 Expiration Date: No expiration date.

Permit Issued To: NESTLE PURINA PETCARE CO
3800 MIDDLE RD
DUNKIRK, NY 14048

Contact: WILLIAM H EHMKE
3800 MIDDLE RD
DUNKIRK, NY 14048-9750
(716) 366-8080

Facility: NESTLE PURINA PET CARE COMPANY
3800 MIDDLE RD
DUNKIRK, NY 14048

Contact: WILLIAM H EHMKE
3800 MIDDLE RD
DUNKIRK, NY 14048-9750
(716) 366-8080

Description:

This facility is located at 3800 Middle Road, Town of Dunkirk, Chautauqua County and is engaged in the manufacturing, packaging, storage and distribution of pet food. The facility capped its sulfur dioxide (SO₂) emissions to avoid major facility permitting (Title V).

Modification 2 Summary of Changes:

1) Boiler 1 was removed so everything associated with boiler 1 was removed from the permit.

2) Boiler 3 was installed to replace boiler 1. A new emission unit (BRL-3), emission point (BLR-3), process (BR3) and emission source /controls (BLR-3) were added for boiler 3. Boiler 3 has the same heat input as boiler 1 and will fire only natural gas, but use distillate oil as a backup in case of a emergency.

a.) This boiler is subject to the requirements of the New Source Performance Standards for Institutional, Commercial, Industrial Boilers, 40 CFR Part 60 subpart Dc. Subpart Dc set sulfur in fuel, opacity and record keeping and reporting requirements. An opacity monitoring permit condition was required by 60.47c(g) The 0.5% by weight sulfur in fuel limit in subpart Dc is more restrictive than the 1.5% by weight sulfur in fuel limit from the state requirements, 6NYCRR Part 225-1, but both are in the permit.



b.) This boiler is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40CFR Part 63 subpart JJJJJ, because it will only combust natural gas so it is defined as a 'gas-fired boiler'. However, the boiler does have the capacity to fire distillate fuel oil in an emergency, so the permittee must track fuel oil usage. If fuel oil usage exceeds 48 hours in a year (8760 hour rolling total), outside of an emergency, then the boiler will become subject to the requirements of subpart JJJJJ.

3) Product steam dryer #6 (emission source id 02800) was replaced with a gas fired dryer #6 in emission unit 0-00001. A new emission point (28001) and emission source /controls for the dryer (28002) and the product separating cyclone (28001) were added for EU 0-00001. Process A21 was retained for the new dryer.

4) The #6 fuel oil storage and handling system was replaced with one that handles distillate fuel oil only. The plant will no longer be able to burn heavy oil, so it was removed from the permit descriptions. The sulfur dioxide emission capping condition was modified to replace #6 fuel oil and distillate fuel oil. The emission limit of 90 tons per year was not changed.

Currently, the facility fires natural gas in its two boilers, but it does have the capability of firing distillate oil also. The boilers provide all of the building and process heat for the facility. There is also a back up natural gas electric generator and an emergency diesel fire pump.

The potential to emit (PTE) SO₂ is 266 tpy but is capped by the permit to less than 90 tpy to avoid major source permitting. With this permit modification the facility can only burn natural gas and light distillate oil, like number 1 and 2, so the worst case NO_x PTE is now approximately 48 tons per year (tpy). This is when the boilers fire natural gas. This is below the 100 tpy applicability level for major source permitting and NO_x RACT (Reasonably Available Control Technology), therefore, references to a NO_x cap have been removed from the permit. By capping SO₂ emissions to 90 tpy while firing 0.5% by weight distillate fuel oil the NO_x PTE from the boilers drops from 75 tpy to 25 tpy, making the facility NO_x PTE approximately 34 tpy.

Emission Unit U00001 consists of all the process emission sources - 39 emission points (EP). These process sources are regulated under 6NYCRR Part 212 and must meet particulate and opacity limits. They are as follows:

- Grain receiving via rail - venting to a dust collector- 1 EP,
- Grain receiving via truck - venting to dust collector- 1 EP,
- Grain milling - two baghouses venting to 1 EP,
- Grain cleaning - 1EP,
- 6 food product conveying systems - 6EPs,
- 5 pet steam heated food dryers with separate cyclones - 5 EPs,
- 1 gas fired pet food dryer with a separate cyclones - 1 EP,
- A byproduct dryer - 1 EP,
- 2 finished product conveying systems - 2 EP's,
- A dry batching bin dust collector - 1 EP,
- 4 finished product coolers - 4 EPs,
- 6 Hammermill grinding filter receivers - 6 EPs,
- 6 Hammermill grinding bin vent filters - which exhaust through separate baghouses - 6 EPs,
- 1 Specialty Pet Hammermill grinding bin with a separate baghouse - 1EP, and
- 4 FP DA mixers with two dust collectors - 2 EPs.



The two dual fuel (natural gas or distillate oil) fired boilers are in Emission Units 0-UBRL2 and U-0BRL3. The two boilers must comply with the sulfur in fuel limits of 6NYCRR Part 225-1 and the particulate and opacity limits in 6NYCRR Part 227-1.

The diesel powered emergency fire pump and the natural gas fired emergency electric generator are exempt from permitting, but their hours of operation must be tracked. Their emissions are included in the SO₂ emission capping calculations. The Olympian G150G1 generator set was installed in 2007 so it is not subject to the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60 subpart JJJJ.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator:

DAVID S DENK
DIVISION OF ENVIRONMENTAL

PERMITS

270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature: _____

Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
 - Applications for permit renewals, modifications and transfers
 - Permit modifications, suspensions or revocations by the Department
 - Permit modifications, suspensions or revocations by the Department

Facility Level

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



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 1-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:

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



Condition 2-1: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Replaces Condition(s) 1-2

Item 2-1.1:

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

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

Condition 1-2: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Replaced by Condition(s) 2-1

Item 1-2.1:

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

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

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

Condition 1-3: Submission of application for permit modification or renewal-REGION 9

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 1-3.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits

New York State Department of Environmental Conservation
Facility DEC ID: 9060300023



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

New York State Department of Environmental Conservation

Permit ID: 9-0603-00023/02001

Facility DEC ID: 9060300023



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: NESTLE PURINA PETCARE CO
3800 MIDDLE RD
DUNKIRK, NY 14048

Facility: NESTLE PURINA PET CARE COMPANY
3800 MIDDLE RD
DUNKIRK, NY 14048

Authorized Activity By Standard Industrial Classification Code:
2047 - DOG CAT AND OTHER PET FOOD

Mod 0 Permit Effective Date: 06/13/2006
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 07/22/2010
date.

Permit Expiration Date: No expiration

Mod 2 Permit Effective Date: 10/14/2011
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *2-1 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 2-2 6 NYCRR 211.1: Air pollution prohibited
- 2-3 6 NYCRR 227-1.3 (a): Compliance Demonstration

Emission Unit Level

EU=0-UBLR3

- 2-4 40CFR 60.42c(d), NSPS Subpart Dc: Compliance Demonstration
- 2-5 40CFR 60.43c(c), NSPS Subpart Dc: Compliance Demonstration
- 2-6 40CFR 60.48c(g)(2), NSPS Subpart Dc: Compliance Demonstration
- 2-7 40CFR 63.11194(a), Subpart JJJJJ: Compliance Demonstration

EU=U-00001

- 1-3 6 NYCRR 212.4 (c): Compliance Demonstration
- 1-4 6 NYCRR 212.6 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 7 ECL 19-0301: Contaminant List
- 1-5 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 9 6 NYCRR Subpart 201-5: Emission Unit Definition
- 1-6 6 NYCRR 211.2: Air pollution prohibited
- 2-8 6 NYCRR 211.2: Visible Emissions Limited
- 2-9 6 NYCRR 225-1.2 (a) (2): Compliance Demonstration

Emission Unit Level

- 12 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 13 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and



procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

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

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

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

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



emergency has the burden of proof.

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

Item F: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.



Item J: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item K: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item 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.

FEDERAL APPLICABLE REQUIREMENTS

The following conditions are federally enforceable.



Condition 1: Facility Permissible Emissions
Effective between the dates of 06/13/2006 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 007446-09-5 (From Mod 2) PTE: 180,000 pounds
per year

Name: SULFUR DIOXIDE

Condition 2-1: Capping Monitoring Condition
Effective between the dates of 10/14/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Replaces Condition(s) 1-1

Item 2-1.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1

Item 2-1.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 2-1.3:

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.

Item 2-1.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.



Item 2-1.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 2-1.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 2-1.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1.) CAPPING LIMIT:

Facility-wide emissions of sulfur dioxide (SO₂) are limited to no more than 90 tons during each consecutive 12 month period.

2.) TRACKING:

Monthly SO₂ emissions shall be calculated based on the consumption of natural gas and fuel oil in the boilers, on the number of hours of operation of the diesel powered fire pump engine and the natural gas emergency electric generator, both at the maximum rated output.

a.) Monthly natural gas consumption for the boilers is obtained from the monthly natural gas bill from the gas supplier.

b.) Monthly fuel oil consumption shall be tracked using a material balance calculation. The fuel oil level in each tank shall be measured and recorded at the beginning and end of each month. The volume of oil delivered between measurements shall be recorded. Certified delivery receipts can be used for tracking the oil shipments received. The volume of oil burned during the month shall be calculated by starting with the volume of oil at beginning of month plus all the oil added to the tanks during the month minus the volume of oil in the tanks at the end of the month.

c.) Operating hours for the diesel powered fire pump engine shall be the difference between the engine's hour meter at the beginning and the end of the month. The hour meter reading shall be recorded at the beginning of each month.



d.) Operating hours of the natural gas fired emergency electric generator shall be the difference between the engine's hour meter at the beginning and the end of the month. The hour meter reading shall be recorded at the beginning of each month.

e.) $SO_2 \text{ total} = SO_2(1) + SO_2(2) + SO_2(3) + SO_2(4)$

$SO_2(1) = (142S \text{ lbs} / 1000 \text{ gallons of distillate oil}) \times 1000 \text{ gallons of distillate oil consumed by boilers BLR - 2 and BLR - 3}$. The S represents the percentage by weight of sulfur in the fuel. S is a weighted average of all residual oil burned during the month.

$SO_2(2) = (0.6 \text{ lbs} / \text{million cubic feet of natural gas}) \times \text{million cubic feet of natural gas consumed by boilers BLR - 2 and BLR - 3 during the month}$.

$SO_2(3) = (0.36 \text{ lbs} / \text{hours of operation}) \times \text{hours of operation per month of the diesel powered fire pump engine}$.

$SO_2(4) = (0.0003 \text{ lbs} / \text{hours of operation}) \times \text{hours of operation per month of the natural gas fired emergency electric generator}$.

3.) RECORD KEEPING:

The facility shall track emissions during each consecutive 12 month period according to the following:

The monthly usage of natural gas and fuel oil shall be recorded in a log kept on site. Operating hours of the diesel powered fire pump engine and the natural gas fired electric generator shall be recorded on an on-site log as well. From the monthly usage logs, the facility shall calculate and record the monthly SO_2 emissions. Such emissions will then be added to the previous 11 months SO_2 emissions to produce a 12 month rolling total. The 12 month calculation shall be performed monthly, no later than 15th of the following month. The result shall be compared to the 90 ton emission limit.

The sulfur content of each fuel oil shipment shall be recorded in the fuel usage log kept on site along with the delivery firm's certification of its authenticity. The monthly weighted average of the fuel oil sulfur content shall then be determined and all its calculations shall be recorded in the log kept on site.

4.) REPORTING:

New York State Department of Environmental Conservation

Permit ID: 9-0603-00023/02001

Facility DEC ID: 9060300023



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

Monitoring Description:

- 1.) No owner or operator of a combustion installation shall operate the installation in such a way to emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test Method 9 in Appendix A of 40 CFR 60.
- 2.) When fuel oil is being fired in either boiler, the facility shall check the stack emissions for smoke on a daily basis, and record the observation(s).
- 3.) Should smoke be observed, the facility shall log the occurrence and take timely corrective action. A log shall be kept on site for this purpose and made available to the Department upon request during normal business hours.
- 4.) The facility shall report to the Department, during normal business hours by telephone or fax, episodes of excessive smoke emissions events which appear to exceed 20 percent opacity.
- 5.) Upon request by the Department, the facility shall evaluate smoke emissions according to EPA Method 9.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 2-4: Compliance Demonstration
Effective between the dates of 10/14/2011 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.42c(d), NSPS Subpart Dc

Item 2-4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-UBLR3

New York State Department of Environmental Conservation

Permit ID: 9-0603-00023/02001

Facility DEC ID: 9060300023



Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 2-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

- 1) The permittee shall not fire fuel oil which exceeds 0.50 percent sulfur by weight.

- 2) The sulfur content of fuel oil fired shall be monitored through the fuel supplier certifications, which must include:
 - the name of the oil supplier;
 - a statement from the oil supplier that the oil delivered complies with the definition of distillate oil in 60.41c. Where 60.41c defines distillate oil as fuel oil the complies with the specification for fuel oil numbers 1 or 2 as defined by the American Society for Testing and Materials (ASTM) in ASTM D396 or diesel fuel oil numbers 1 or 2 as defined in ASTM D975; and
 - the sulfur content or maximum sulfur content of the oil.

- 3) A copy of the fuel supplier certification and information in item 2 above shall be kept for at least five years.

- 4) Semi annually, the owner or operator shall submit a certified and signed statement which states that the fuel supplier certifications submitted with the certification represent all of the fuel combustion in the affected source during the reporting period.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.50 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 2-5: Compliance Demonstration

Effective between the dates of 10/14/2011 and Permit Expiration Date



Applicable Federal Requirement:40CFR 60.43c(e), NSPS Subpart Dc

Item 2-5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-UBLR3

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2-5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

LIMIT 43c(c)

1) This affected source shall not discharged into the atmosphere gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

2) SITE SPECIFIC MONITORING PLAN 47c(g)

a.) When firing distillate fuel oil during boiler tuning and during emergency operations (episodes of emergency curtailment of natural gas) as allowed by this permit, the facility shall observe the stack for visible emissions and record the observation(s).

b.) Should visible emissions be observed after boiler tuning has been completed or during emergency operation, the facility shall log the occurrence and take timely corrective action. A log shall be kept on site for this purpose and be made available to the Department upon request, during normal business hours.

c.) The facility shall report to the Department, during normal business hours by telephone (716-851-7130) or fax (716-851-7009), episodes of excessive visible emissions which appear to exceed 20 percent opacity after tuning has been completed or during emergency operation.

d.) Upon request by the Department, the facility shall evaluate visible emissions according to EPA Method 9.

3) RECORD KEEPING 48c(c)

In addition to the applicable requirements in §60.7, the owner or operator shall maintain the following records for each performance test conducted using Method 9:

a.) Dates and time intervals of all opacity observation periods;

b.) Name, affiliation, and copy of current visible emission reading certification for each visible emission



observer participating in the performance test; and
c.) Copies of all visible emission observer opacity field data sheets.

4) REPORTING 48c(b)&(c)

The owner or operator shall submit to the Administrator the performance test data from the initial opacity compliance test and any subsequent performance tests. In addition to the applicable requirements in §60.7, the owner or operator shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period semiannually.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 2-6: Compliance Demonstration
Effective between the dates of 10/14/2011 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.48c(g)(2), NSPS Subpart Dc

Item 2-6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-UBLR3

Item 2-6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- 1) The owner or operator shall record and maintain records of the amount of each fuel combusted in the affect source during each calendar month.
- 2) These fuel use records shall be maintained for at least two years from the date of the record.
- 3) These records shall be submitted to the department upon request.

Monitoring Frequency: MONTHLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



Condition 2-7: Compliance Demonstration
Effective between the dates of 10/14/2011 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63.11194(a), Subpart JJJJJ

Item 2-7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-UBLR3

Item 2-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

1) NPPC has committed to operate boiler 3 as a 'gas-fired boiler' as defined in 40 CFR subpart 63-JJJJJ (6J's), National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, so that it is not subject to the requirements of this subpart.

2) Subpart JJJJJ, 60.11237 defines a 'gas-fired boiler' as "any boiler that burns gaseous fuel not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies or periodic testing on liquid fuel. Periodic testing of liquid fuels shall not exceed the combined total of 48 hours during any calendar year."

3) Subpart JJJJJ, 60.11237 defines 'period of natural gas curtailment or supply interruption' to mean "a period of time during which the supply of natural gas to an affected facility is halted for reasons beyond the control of the facility. The act of entering into a contractual agreement with a supplier of natural gas established for curtailment purposes does not constitute a reason that is under the control of a facility for the purposes of this definition. An increase in the cost or unit price of natural gas does not constitute a period of natural gas curtailment or supply interruption."

4) If a liquid fuel is used for more than a combined total of 48 hours during any calendar year, outside of a gas curtailment or gas supply emergency, then boiler 3 will become subject to subpart JJJJJ and will need to comply with the requirements of this regulation.

5) Record the number of hours each day that fuel oil is burned in boiler 3 and calculate a rolling 8760 hour



total, on an hourly basis.

6) The fuel use records shall be kept on site and made available for review upon request and submitted to the department upon request.

Monitoring Frequency: HOURLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-3: Compliance Demonstration

Effective between the dates of 07/22/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Replaces Condition(s) 5

Item 1-3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

1.) For each stack, emissions of solid particulates shall not exceed 0.050 grains per cubic foot of exhaust gas, expressed as standard conditions on a dry basis.

2.) Upon written request from the Department, the facility shall conduct emission testing using EPA Method 5 to evaluate compliance.

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: 40CFR Part 60, App. A, Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-4: Compliance Demonstration

Effective between the dates of 07/22/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Replaces Condition(s) 6

Item 1-4.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-0603-00023/02001

Facility DEC ID: 9060300023



Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1.) No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. If any visible emissions are identified, corrective action is required.
- 2.) The facility shall check stack emissions for visible emissions at least once every two calendar weeks (biweekly) and record the observation in a log. Six months after the issuance date of this permit, the facility may request the visible emission observations frequency be changed to monthly, based on the past observations.
- 3.) Should visible emissions be observed, the facility shall log the occurrence and take timely corrective action. A log shall be kept on site for this purpose and made available to the Department upon request during normal business hours.
- 4.) The facility shall report to the Department, during normal business hours by telephone or fax, episodes of excessive emissions events which appear to exceed 20 percent opacity.
- 5.) Upon request by the Department, the facility shall evaluate opacity of emissions according to EPA Method 9.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS



The following conditions are state only enforceable.

Condition 7: Contaminant List
Effective between the dates of 06/13/2006 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 7.1:

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

CAS No: 007446-09-5
Name: SULFUR DIOXIDE

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

Condition 1-5: Unavoidable noncompliance and violations
Effective between the dates of 07/22/2010 and Permit Expiration Date

Applicable State Requirement: 6 NYCRR 201-1.4

Replaces Condition(s) 8

Item 1-5.1:

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

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

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective



action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superseded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

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

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

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

Condition 9: Emission Unit Definition
Effective between the dates of 06/13/2006 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 9.1(From Mod 2):

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

Emission Unit: 0-UBLR2

Emission Unit Description:

Boiler #2 - a boiler that can burn natural gas or fuel oil.

Building(s): 4

Item 9.2(From Mod 2):

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

Emission Unit: 0-UBLR3

Emission Unit Description:

Boiler #3 - a boiler that can burn natural gas or distillate fuel oil.

Building(s): 4

Item 9.3(From Mod 2):

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

Emission Unit: U-00001

Emission Unit Description:

Emission Unit U00001 consists of all the process emission sources at the facility, 39 emission points (EP). These

New York State Department of Environmental Conservation

Permit ID: 9-0603-00023/02001

Facility DEC ID: 9060300023



Item 2-9.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: 0-UBLR2

Emission Unit: 0-UBLR3

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 2-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

No person shall use, purchase, sell, or offer for sale any fuel oil which has a sulfur content greater than the limit presented below. A log of the sulfur content in oil per delivery must be maintained on site for a minimum of five years after the date of the last entry.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: OIL (NOT ELSEWHERE CLASSIFIED)

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 12: Emission Point Definition By Emission Unit

Effective between the dates of 06/13/2006 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 12.1(From Mod 2):

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

Emission Unit: 0-UBLR2

Emission Point: 0BLR2

Height (ft.): 48

Diameter (in.): 36

NYTMN (km.): 4712.7

NYTME (km.): 145.05

Building: 4

Item 12.2(From Mod 2):



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

Emission Unit: 0-UBLR3

Emission Point: 0BLR3

Height (ft.): 48 Diameter (in.): 36
NYTMN (km.): 4712.7 NYTME (km.): 145. Building: 4

Item 12.3(From Mod 2):

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

Emission Unit: U-00001

Emission Point: 00019

Height (ft.): 46 Diameter (in.): 30
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 8

Emission Point: 28001

Height (ft.): 64 Diameter (in.): 36
NYTMN (km.): 4712.7 NYTME (km.): 145. Building: 8

Emission Point: 00001

Height (ft.): 30 Diameter (in.): 12
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 6

Emission Point: 00002

Height (ft.): 30 Diameter (in.): 12
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 6

Emission Point: 00003

Height (ft.): 179 Diameter (in.): 30
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 1

Emission Point: 00004

Height (ft.): 177 Diameter (in.): 6
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 1

Emission Point: 00010

Height (ft.): 38 Diameter (in.): 18
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 8

Emission Point: 00011

Height (ft.): 38 Diameter (in.): 18
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 8

Emission Point: 00012

Height (ft.): 38 Diameter (in.): 18
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 8

Emission Point: 00013

Height (ft.): 38 Diameter (in.): 18

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NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 8
Emission Point: 00014		
Height (ft.): 38	Diameter (in.): 18	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 8
Emission Point: 00015		
Height (ft.): 46	Diameter (in.): 30	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 8
Emission Point: 00016		
Height (ft.): 46	Diameter (in.): 30	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 8
Emission Point: 00017		
Height (ft.): 46	Diameter (in.): 30	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 8
Emission Point: 00018		
Height (ft.): 46	Diameter (in.): 30	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 8
Emission Point: 00023		
Height (ft.): 36	Diameter (in.): 24	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 8
Emission Point: 00027		
Height (ft.): 28	Diameter (in.): 12	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 15
Emission Point: 01263		
Height (ft.): 29	Diameter (in.): 5	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 2
Emission Point: 02314		
Height (ft.): 31	Diameter (in.): 16	
NYTMN (km.): 4712.9	NYTME (km.): 145.	Building: 25
Emission Point: 02785		
Height (ft.): 38	Diameter (in.): 18	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 8
Emission Point: 04000		
Height (ft.): 32	Diameter (in.): 10	
NYTMN (km.): 4712.7	NYTME (km.): 145.05	Building: 2
Emission Point: 06187		
Height (ft.): 41	Diameter (in.): 6	
NYTMN (km.): 4712.9	NYTME (km.): 145.	Building: 25
Emission Point: 08000		

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Height (ft.): 83 NYTMN (km.): 4712.7	Diameter (in.): 36 NYTME (km.): 145.05	Building: 25
Emission Point: 08001 Height (ft.): 83 NYTMN (km.): 4712.7	Diameter (in.): 36 NYTME (km.): 145.05	Building: 25
Emission Point: R0002 Height (ft.): 83 NYTMN (km.): 4712.7	Diameter (in.): 36 NYTME (km.): 145.05	Building: 25
Emission Point: R0003 Height (ft.): 83 NYTMN (km.): 4712.7	Diameter (in.): 36 NYTME (km.): 145.05	Building: 25
Emission Point: R0004 Height (ft.): 41 NYTMN (km.): 4712.7	Diameter (in.): 29 NYTME (km.): 145.05	Building: 8
Emission Point: R0005 Height (ft.): 41 NYTMN (km.): 4712.7	Diameter (in.): 29 NYTME (km.): 145.05	Building: 8
Emission Point: R0006 Height (ft.): 41 NYTMN (km.): 4712.7	Diameter (in.): 29 NYTME (km.): 145.05	Building: 8
Emission Point: R0007 Height (ft.): 41 NYTMN (km.): 4712.7	Diameter (in.): 29 NYTME (km.): 145.05	Building: 8
Emission Point: R0008 Height (ft.): 34 NYTMN (km.): 4712.7	Diameter (in.): 20 NYTME (km.): 145.05	Building: 8
Emission Point: R0009 Height (ft.): 34 NYTMN (km.): 4712.7	Diameter (in.): 20 NYTME (km.): 145.05	Building: 8
Emission Point: R0010 Height (ft.): 34 NYTMN (km.): 4712.7	Diameter (in.): 20 NYTME (km.): 145.05	Building: 8
Emission Point: R0011 Height (ft.): 34 NYTMN (km.): 4712.7	Diameter (in.): 20 NYTME (km.): 145.05	Building: 8
Emission Point: R0012 Height (ft.): 41 NYTMN (km.): 4712.7	Diameter (in.): 29 NYTME (km.): 145.05	Building: 8

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Emission Point: R0013
Height (ft.): 41 Diameter (in.): 29
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 8

Emission Point: R0014
Height (ft.): 34 Diameter (in.): 20
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 8

Emission Point: R0015
Height (ft.): 34 Diameter (in.): 20
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 8

Emission Point: R0016
Height (ft.): 25 Diameter (in.): 14
NYTMN (km.): 4712.7 NYTME (km.): 145.05 Building: 1

Condition 13: Process Definition By Emission Unit
Effective between the dates of 06/13/2006 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 13.1(From Mod 2):

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

Emission Unit: 0-UBLR2
Process: A27 Source Classification Code: 1-03-006-02
Process Description:
Boiler #2 -a boiler that can burn natural gas or fuel
oil.

Emission Source/Control: 0BLR2 - Combustion
Design Capacity: 64 million Btu per hour

Item 13.2(From Mod 2):

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

Emission Unit: 0-UBLR3
Process: BR3 Source Classification Code: 1-03-006-02
Process Description:
Boiler #3 - a boiler that can burn natural gas or
distillate fuel oil.

Emission Source/Control: 0BLR3 - Combustion
Design Capacity: 64 million Btu per hour

Item 13.3(From Mod 2):

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

Emission Unit: U-00001
Process: A19
Process Description: Pet Food Dryer #5

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Emission Source/Control: 21DRY - Process

Item 13.4(From Mod 2):

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

Emission Unit: U-00001

Process: A21

Process Description:

Pet Food Dryer #6 - a natural gas fired product drier.

Emission Source/Control: 28001 - Control

Control Type: CENTRIFUGAL

Emission Source/Control: 28002 - Process

Item 13.5(From Mod 0):

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

Emission Unit: U-00001

Process: 0A1

Process Description: Grain Receiving - Rail

Emission Source/Control: 00001 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 01GRA - Process

Item 13.6(From Mod 0):

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

Emission Unit: U-00001

Process: 0A2

Process Description: Grain Receiving - Truck

Emission Source/Control: 00002 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 02GRA - Process

Item 13.7(From Mod 0):

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

Emission Unit: U-00001

Process: 0A3

Process Description: Grain Milling - 2 Dust collectors to Roof Vent

Emission Source/Control: 00003 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 03GRA - Process

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Item 13.8(From Mod 0):

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

Emission Unit: U-00001

Process: 0A4

Process Description:

Grain Cleaning Process (Soft Stock Scalpter & Elev. Leg
Dust Collection)

Emission Source/Control: 00004 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 04DRY - Process

Item 13.9(From Mod 0):

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

Emission Unit: U-00001

Process: 0A5

Process Description:

Bank 2 Wholestream Grinding Hammermill Bin Vent Filter
(#5223)

Emission Source/Control: R0014 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 05DRY - Process

Item 13.10(From Mod 0):

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

Emission Unit: U-00001

Process: 0A6

Process Description:

Bank 6 Wholestream Grinding Hammermill Bin Vent Filter
(#5623)

Emission Source/Control: R0011 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 06GRI - Process

Item 13.11(From Mod 0):

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

Emission Unit: U-00001

Process: 0A7

Process Description:

Bank 5 Wholestream Grinding Hammermill Bin Vent Filter
(#5523)

New York State Department of Environmental Conservation

Permit ID: 9-0603-00023/02001

Facility DEC ID: 9060300023



Item 13.16(From Mod 0):

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

Emission Unit: U-00001
Process: A12
Process Description: Extruded Products Conveyance System #3

Emission Source/Control: 00012 - Process

Item 13.17(From Mod 0):

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

Emission Unit: U-00001
Process: A13
Process Description: Extruded Product Conveyance System #4

Emission Source/Control: 00013 - Process

Item 13.18(From Mod 0):

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

Emission Unit: U-00001
Process: A14
Process Description: Extruded Product Conveyance System #5

Emission Source/Control: 00014 - Process

Item 13.19(From Mod 0):

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

Emission Unit: U-00001
Process: A15
Process Description: Pet Food Dryer #1

Emission Source/Control: 00015 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: 19DRY - Process

Item 13.20(From Mod 0):

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

Emission Unit: U-00001
Process: A16
Process Description: Pet Food Dryer #2

Emission Source/Control: 00016 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: 16DRY - Process

New York State Department of Environmental Conservation

Permit ID: 9-0603-00023/02001

Facility DEC ID: 9060300023



Item 13.21(From Mod 0):

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

Emission Unit: U-00001
Process: A17
Process Description: Pet Food Dryer #3

Emission Source/Control: 00017 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: 17OVN - Process

Item 13.22(From Mod 0):

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

Emission Unit: U-00001
Process: A18
Process Description: Pet Food Dryer #4

Emission Source/Control: 00018 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: 18DRI - Process

Item 13.23(From Mod 0):

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

Emission Unit: U-00001
Process: A20
Process Description: Extruded Product Conveyance System #6

Emission Source/Control: 02785 - Process

Item 13.24(From Mod 1):

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

Emission Unit: U-00001
Process: A22
Process Description: By-Product Dryer for pet food manufacturing

Source Classification Code: 3-02-040-01

Emission Source/Control: 00023 - Process

Item 13.25(From Mod 0):

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

Emission Unit: U-00001
Process: A23
Process Description: Tender Vittles Conveyance System #1

Emission Source/Control: 00027 - Control

New York State Department of Environmental Conservation

Permit ID: 9-0603-00023/02001

Facility DEC ID: 9060300023



Control Type: CENTRIFUGAL

Emission Source/Control: 23000 - Process

Item 13.26(From Mod 0):

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

Emission Unit: U-00001

Process: A24

Process Description: KitNKaboodle Transfer System

Emission Source/Control: 01263 - Process

Item 13.27(From Mod 0):

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

Emission Unit: U-00001

Process: A25

Process Description: Dry Batching OddPound Bin Dust Collector

Emission Source/Control: 04000 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 25DRI - Process

Item 13.28(From Mod 0):

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

Emission Unit: U-00001

Process: A28

Process Description: Finished Product Cooler #1

Emission Source/Control: 08000 - Process

Item 13.29(From Mod 0):

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

Emission Unit: U-00001

Process: A29

Process Description: Finished Product Cooler #2

Emission Source/Control: R0002 - Process

Item 13.30(From Mod 0):

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

Emission Unit: U-00001

Process: A30

Process Description: Finished Product Cooler #3

Emission Source/Control: 08001 - Process



Emission Source/Control: R0005 - Process

Item 13.36(From Mod 0):

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

Emission Unit: U-00001
Process: A36
Process Description:
Bank 5 Wholestream Grinding Hammermill Filter Receiver
(#5531)

Emission Source/Control: R0006 - Process

Item 13.37(From Mod 0):

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

Emission Unit: U-00001
Process: A37
Process Description:
Bank 6 Wholestream Grinding Hammermill Filter Receiver
(#5631)

Emission Source/Control: R0007 - Process

Item 13.38(From Mod 0):

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

Emission Unit: U-00001
Process: A38
Process Description:
Bank 1 Wholestream Grinding Hammermill Bin Vent Filter
(#5123)

Emission Source/Control: R0008 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 38GRI - Process

Item 13.39(From Mod 0):

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

Emission Unit: U-00001
Process: A39 Source Classification Code: 3-02-008-10
Process Description:
Speciality Pet Wholestream Grinding Hammermill Bin Vent
Baghouse (#3356)

Emission Source/Control: R0016 - Control
Control Type: FABRIC FILTER

New York State Department of Environmental Conservation

Permit ID: 9-0603-00023/02001

Facility DEC ID: 9060300023



Emission Source/Control: 16000 - Process

Item 13.40(From Mod 1):

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

Emission Unit: U-00001

Process: A40

Source Classification Code: 3-02-008-09

Process Description: FP DA Mixers #1 & 2 Dust Collector (#2314)

Emission Source/Control: 02314 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 02310 - Process

Emission Source/Control: 02311 - Process

Item 13.41(From Mod 1):

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

Emission Unit: U-00001

Process: A41

Source Classification Code: 3-02-008-09

Process Description: FP DA Mixers #3 & 4 Dust Collector (#6187)

Emission Source/Control: 06187 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 02555 - Process

Emission Source/Control: 02575 - Process

