

**New York State Department of Environmental Conservation  
Facility DEC ID: 9146400040**



**PERMIT  
Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-1464-00040/00110  
Mod 0 Effective Date: 06/09/2004 Expiration Date: No expiration date.  
Mod 1 Effective Date: 03/17/2006 Expiration Date: No expiration date.  
Mod 2 Effective Date: 08/03/2006 Expiration Date: No expiration date.  
Mod 3 Effective Date: 11/28/2006 Expiration Date: No expiration date.

Permit Issued To: FMC CORP  
1735 MARKET ST  
PHILADELPHIA, PA 19103

Contact: MICHAEL J CHENEY  
FMC CORP - ACTIVE OXIDANTS DIV  
35 SAWYER AVE  
TONAWANDA, NY 14150  
(716) 879-0401

Facility: FMC CORP - ACTIVE OXIDANTS  
37 SAWYER AVE  
TONAWANDA, NY 14150

Contact: RICHARD K WISE  
FMC CORPORATION - ACTIVE OXIDANTS DIV  
35 SAWYER AVE  
TONAWANDA, NY 14150  
(716) 879-0405

Description:  
This Department initiated modification was necessary to correct a permitting error in permit modification 2 issued on August 3, 2006. In that modification, FMC was improperly required to conduct performance testing of the two new boilers. This modification removes the testing requirement and adds a new condition per 40 CFR 60, Subpart Dc, §60.45c which states that emissions monitoring testing for units that burn only gaseous fuels, such as natural gas, with certain characteristics is not required.

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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:            DOUGLAS E BORSCHER  
   270 MICHIGAN AVE  
   BUFFALO, NY 14203-2999

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**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  
Applications for Permit Renewals and Modifications  
Permit modifications, suspensions or revocations by the Department  
Permit Modifications, Suspensions and Revocations by the Department

**Facility Level**

Submission of Applications for Permit Modification or Renewal -REGION 9  
HEADQUARTERS  
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 3-1: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6NYCRR 621.11**

**Item 3-1.1:**

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 3-1.2:**

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 3-1.3:**

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



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actual transfer of ownership.

**Condition 3: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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

**Condition 3-2: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 3-2.1:**

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

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

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

**Item 4.1:**

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,

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

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2999  
(716) 851-7165

**Condition 3-3: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.6(a)**

**Item 3-3.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2999  
(716) 851-7165

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**Permit Under the Environmental Conservation Law (ECL)**

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

**IDENTIFICATION INFORMATION**

Permit Issued To: FMC CORP  
1735 MARKET ST  
PHILADELPHIA, PA 19103

Facility: FMC CORP - ACTIVE OXIDANTS  
37 SAWYER AVE  
TONAWANDA, NY 14150

Authorized Activity By Standard Industrial Classification Code:  
2819 - INDUSTRIAL INORGANIC CHEMICALS  
2869 - INDUSTRIAL ORGANIC CHEMICALS, NEC

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**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1-1 6NYCRR 201-7.1: Facility Permissible Emissions
- \*2-1 6NYCRR 201-7.1: Capping Monitoring Condition
- 1 6NYCRR 212.4(c): Compliance Demonstration
- 2 6NYCRR 212.6(a): Compliance Demonstration

**Emission Unit Level**

**EU=U-BOIL2**

- 2-2 6NYCRR 227-1.3(a): Compliance Demonstration
- 2-3 40CFR 60.7(a), NSPS Subpart A: Date of construction notification -  
If a COM is not used.
- 2-5 40CFR 60.42c(i), NSPS Subpart Dc: Enforceability.
- 2-6 40CFR 60.43c(c), NSPS Subpart Dc: Compliance Demonstration
- 2-7 40CFR 60.43c(d), NSPS Subpart Dc: Enforceability of particulate  
matter and opacity standards.
- 2-4 40CFR 60.43c(e)(1), NSPS Subpart Dc: Compliance Demonstration
- 3-1 40CFR 60.45c, NSPS Subpart Dc: Compliance Demonstration
- 2-9 40CFR 60.48c, NSPS Subpart Dc: Compliance Demonstration
- 2-10 40CFR 60.48c(a), NSPS Subpart Dc: Compliance Demonstration
- 2-11 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration
- 2-12 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 4 ECL 19-0301: Contaminant List
- 5 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 6 6NYCRR 201-5: Emission Unit Definition
- 10 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 11 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 12 6NYCRR 201-5: Process Definition By Emission Unit

**EU=U-PERS1,EP=00017,Proc=PER,ES=EP17A**

- 13 6NYCRR 212.9(b): Compliance Demonstration

**EU=U-PERS1,EP=00039,Proc=PER,ES=EP39A**

- 14 6NYCRR 212.9(b): Compliance Demonstration

**EU=U-PERS1,EP=00040,Proc=PER,ES=EP40A**

- 15 6NYCRR 212.9(b): Compliance Demonstration

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 - 6NYCRR Part 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

**Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6**

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

**Item C: Maintenance of Equipment - 6NYCRR Part 200.7**

Any person who owns or operates an air contamination

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source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

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

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

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

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

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

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event



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

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

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

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

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

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

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

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

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

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific



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

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

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

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

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Item L: Open Fires - 6 NYCRR Part 215**

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**Item M: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not

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limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

**FEDERAL APPLICABLE REQUIREMENTS**

**The following conditions are federally enforceable.**

**Condition 1-1: Facility Permissible Emissions**

**Effective between the dates of 03/17/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7.1**

**Item 3-1.1:**

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 3) PTE: 196,000 pounds per year  
Name: SULFUR DIOXIDE

**Condition 2-1: Capping Monitoring Condition**

**Effective between the dates of 08/03/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7.1**

**Replaces Condition(s) 1-2**

**Item 2-1.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of



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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:

6NYCRR 201-6.1(a)(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: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility wide SO<sub>2</sub> emission total is restricted to 196,000 pounds or less as determined by summing the individual monthly emissions during any consecutive 12 month period. This emission limit caps the facility under the major source threshold for SO<sub>2</sub> emissions, which is 100 tons of SO<sub>2</sub> per year, as defined in 6 NYCRR Part 201-2.1(b)(21).



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By the end of each month, the facility shall calculate total SO<sub>2</sub> emissions for the previous month and total SO<sub>2</sub> emissions for the previous consecutive 12 month period. Monthly SO<sub>2</sub> emissions from the boilers are determined as follows:

$$\text{SO}_2 \text{ (lb/month)} = \text{SO}_{\text{ng}} + \text{SO}_{\#2\text{oil}}$$

where,

SO<sub>ng</sub> = Monthly SO<sub>2</sub> emission rate based on natural gas usage by boilers

$$\text{SO}_{\text{ng}} = (\text{MMcf nat. gas burned in boilers/month}) \times (0.6 \text{ lb/MMcf})$$

SO<sub>#2oil</sub> = Monthly SO<sub>2</sub> emission rate based on #2 fuel oil usage by boilers

$$\text{SO}_{\#2\text{oil}} = (\text{gal. \#2 oil burned in boilers/month}) \times (157S \text{ lb/1000 gal})$$

S = % sulfur content of the distillate oil

The emissions factors used in the above equation, (0.6 lb SO<sub>2</sub>/ MMcf natural gas) and (157S lb SO<sub>2</sub>/ 1000 gal #2 oil), are from the USEPA Compilation of Air Pollution Emission Factors (AP-42), Fifth Edition, Volume I, Table 1.4-2 (July 1998) and Table 1.3-1 (September 1998), respectively.

The facility shall maintain records showing the quantity of fuel burned on a monthly basis. Records shall be based on verifiable data such as fuel metering data or fuel purchase records to confirm the general accuracy of the monthly fuel usage amounts. All fuel usage records and corresponding emission calculations shall be kept on site for a minimum of five (5) years. This information shall be made available to the Department upon request.

The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly SO<sub>2</sub> emissions and total SO<sub>2</sub> emissions for each rolling 12-month period throughout the calendar year.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)



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Reports due 30 days after the reporting period.  
The initial report is due 1/30/2007.  
Subsequent reports are due every 12 calendar month(s).

**Condition 1: Compliance Demonstration**  
**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 1.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 1.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility is subject to the 6NYCRR Part 212.4(c) particulate limit of 0.05 grains per dry standard cubic foot of exhaust gas. FMC must follow the manufacturer's recommended maintenance procedures for the fabric filters and the facility's standard operating procedures, which include several qualitative measures, to ensure compliance with the particulate emission standard. Periodic visible emissions observations of all particulate-emitting emission points will occur weekly during daylight hours, with the results recorded and retained for a minimum of two years. If any visible emissions are identified, corrective action is required. The records will be made available to Department representatives during normal business hours.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2: Compliance Demonstration**  
**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 2.1:**

The Compliance Demonstration activity will be performed for the Facility.



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Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 2.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility is subject to the 6NYCRR Part 212.6(a) opacity standard. FMC shall not 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. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

FMC will conduct weekly visible emissions observations of all particulate-emitting emission points while the associated processes are in operation. FMC will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal and in compliance with Section 212.6(a) are detected, FMC shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, FMC will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site for a minimum of two years in a format acceptable to the Department. The records will be made available to Department representatives during normal business hours.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

**Condition 2-2: Compliance Demonstration**  
**Effective between the dates of 08/03/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 227-1.3(a)**

**Item 2-2.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

**Item 2-2.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit U-BOIL2 on a monthly basis. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 6NYCRR Part 227.1.3(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.



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Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-3: Date of construction notification - If a COM is not used.  
Effective between the dates of 08/03/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 60.7(a), NSPS Subpart A**

**Item 2-3.1:**

This Condition applies to Emission Unit: U-BOIL2

**Item 2-3.2:**

Any owner or operator subject to this part shall furnish the Administrator with the following information:

- 1) a notification of the date construction or reconstruction commenced, post marked no later than 30 days after such date;
- 3) a notification of the actual date of initial start up, post marked within 15 days after such date;
- 4) a notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless the change is specifically exempted under this part. The notice shall be post marked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capability of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional information regarding the change;
- 5) a notification of the date upon which the demonstration of continuous monitoring system performance commences, post marked not less than 30 days prior to such date;
- 6) a notification of the anticipated date for conducting the opacity observations, post marked not less than 30 days prior to such date.

**Condition 2-5: Enforceability.**

**Effective between the dates of 08/03/2006 and Permit Expiration Date**

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

**Item 2-5.1:**

This Condition applies to Emission Unit: U-BOIL2

**Item 2-5.2:**

The sulfur dioxide emission limits, percentage reductions, and fuel oil sulfur limitations shall apply at all



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times, including periods of startup, shutdown, and malfunction.

**Condition 2-6: Compliance Demonstration**

**Effective between the dates of 08/03/2006 and Permit Expiration Date**

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

**Item 2-6.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 2-6.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause to be discharged into the atmosphere from an affected facility any 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. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit U-BOIL2 on a monthly basis. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 40CFR60.43(c)c and 6NYCRR Part 227.1.3(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are



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made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-7: Enforceability of particulate matter and opacity standards.**

**Effective between the dates of 08/03/2006 and Permit Expiration Date**

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

**Item 2-7.1:**

This Condition applies to Emission Unit: U-BOIL2

**Item 2-7.2:**

The particulate matter and opacity standards of section 40 CFR 60-Dc.43c apply at all times, except during periods of startup, shutdown, and malfunction.

**Condition 2-4: Compliance Demonstration**

**Effective between the dates of 08/03/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 60.43c(e)(1), NSPS Subpart Dc**

**Item 2-4.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 2-4.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of a boiler with a heat input of 30

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mmBtu/hr or greater which was constructed, reconstructed, or modified after February 28, 2005, must conduct performance testing in accordance with the provisions of 40 CFR 60.8 to verify compliance with the specified particulate matter limit. The testing must be completed within 180 days of startup.

A test protocol shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date. Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Records of the required compliance testing must be maintained at the facility for a minimum of five years.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.030 pounds per million Btus

Reference Test Method: EPA Method 5

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 3-1: Compliance Demonstration**

**Effective between the dates of 11/28/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 60.45c, NSPS Subpart Dc**

**Item 3-1.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

**Item 3-1.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Units that burn only oil containing no more than 0.5 weight percent sulfur or liquid or gaseous fuels with potential sulfur dioxide emission rates of 230 ng/J (0.54 lb/MMBtu) heat input or less are not required to conduct emissions monitoring if they maintain fuel supplier certifications of the sulfur content of the fuels burned.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-9: Compliance Demonstration**

**Effective between the dates of 08/03/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 60.48c, NSPS Subpart Dc**

**Item 2-9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

**Item 2-9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected facility subject to the SO<sub>2</sub> emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c and/or §60.43c shall keep records and submit reports as required under §60.48c(d) and §60.48c(e) including the following information.

If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification shall include the following information for distillate oil as described under paragraph §60.48c(f)(1):

- i) The name of the oil supplier, and
- ii) A statement from the oil supplier that the oil complies with the specifications in §60.41c which defines distillate oil as fuel that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, a Standard Specification for Fuel Oils.

In addition to records of fuel supplier certification, the semi-annual report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the period.



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The semi-annual report shall be sent to the following two addresses:

Chief, Stationary Source Compliance Section  
USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, New York 10007-1866

New York State Department of Environmental  
Conservation  
Regional Air Pollution Control Engineer  
270 Michigan Avenue  
Buffalo, New York 14203-2999

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

**Condition 2-10: Compliance Demonstration**

**Effective between the dates of 08/03/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 60.48c(a), NSPS Subpart Dc**

**Item 2-10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

**Item 2-10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner and operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

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(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40CFR 60.42c, or 40 CFR 60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

The notification shall be sent to the following two addresses:

Chief, Stationary Source Compliance Section  
USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, New York 10007-1866

Regional Air Pollution Control Engineer  
NYSDEC Region 9  
270 Michigan Avenue  
Buffalo, New York 14203-2999

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-11: Compliance Demonstration**

**Effective between the dates of 08/03/2006 and Permit Expiration Date**

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

**Item 2-11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

**Item 2-11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

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Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-12: Compliance Demonstration**

**Effective between the dates of 08/03/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 60.48c(i), NSPS Subpart Dc**

**Item 2-12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

**Item 2-12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

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 - 6NYCRR Part 201-1.10(a)**

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

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

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

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

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law.

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 4: Contaminant List**

**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable State Requirement: ECL 19-0301**

**Item 4.1:**

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

CAS No: 007664-41-7

Name: AMMONIA

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

**Condition 5: Unavoidable noncompliance and violations**

**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-1.4**

**Item 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.

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(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 6: Emission Unit Definition**  
**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 6.1(From Mod 3):**

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

Emission Unit: U-BOIL2

Emission Unit Description:

This emission unit consists of two 800 HP Cleaver Brooks CB-4WI dual fuel boilers. The boilers can burn either natural gas or #2 fuel oil. Each boiler is rated at 33 mmBTU/hr.

Building(s): BOILER

**Item 6.2(From Mod 0):**

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

Emission Unit: U-CELL1

Emission Unit Description:



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This emission unit consists of electrochemical production cells for the manufacture of ammonium and sodium persulfates in Plants 1 and 2.

Building(s): PLANT 1  
PLANT 2

**Item 6.3(From Mod 1):**

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

Emission Unit: U-PERS1

Emission Unit Description:

This emission unit consists of ammonia absorbers, process material dryers, and blending and packaging equipment used in the processing and packaging of inorganic solid chemicals associated with the persulfates production line.

Emissions consist of particulates, ammonia and hydrogen cyanide from the fluidized bed dryers, blenders, packaging systems and ancillary equipment associated with the drying process. All particulate generating processes are captured by dust collection systems or scrubbers. Ammonia and hydrogen cyanide are emitted from the ammonia absorption equipment.

Building(s): Plant 3

**Item 6.4(From Mod 0):**

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

Emission Unit: U-TANK1

Emission Unit Description:

This emission unit consists of emissions from five bulk chemical storage tanks containing hydrogen peroxide, potassium hydroxide, caustic soda and sulfuric acid maintained at atmospheric pressure. In addition, emissions from the process vessels and building ventilation system associated with peracetic acid production is included in this emission unit.

Building(s): PERACID  
TANK FARM

**Condition 10: Air pollution prohibited**

**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 10.1:**

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity,



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characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

**Condition 11: Emission Point Definition By Emission Unit**  
**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 11.1(From Mod 3):**

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

Emission Unit: U-BOIL2

Emission Point: 00073

Height (ft.): 34

Diameter (in.): 24

NYTMN (km.): 4765.1

NYTME (km.): 179.8

Building: BOILER

Emission Point: 00074

Height (ft.): 34

Diameter (in.): 24

NYTMN (km.): 4765.1

NYTME (km.): 179.8

Building: BOILER

**Item 11.2(From Mod 0):**

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

Emission Unit: U-CELL1

Emission Point: 00019

Height (ft.): 39

Diameter (in.): 12

NYTMN (km.): 4765.1

NYTME (km.): 179.8

Building: PLANT 2

Emission Point: 00020

Height (ft.): 39

Diameter (in.): 12

NYTMN (km.): 4765.1

NYTME (km.): 179.8

Building: PLANT 2

Emission Point: 00021

Height (ft.): 39

Diameter (in.): 12

NYTMN (km.): 4765.1

NYTME (km.): 179.8

Building: PLANT 2

Emission Point: 00022

Height (ft.): 39

Diameter (in.): 12



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NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2
Emission Point: 00023		
Height (ft.): 39	Diameter (in.): 12	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2
Emission Point: 00024		
Height (ft.): 39	Diameter (in.): 12	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2
Emission Point: 00025		
Height (ft.): 39	Diameter (in.): 12	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2
Emission Point: 00026		
Height (ft.): 39	Diameter (in.): 12	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2
Emission Point: 00027		
Height (ft.): 39	Diameter (in.): 12	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2
Emission Point: 00028		
Height (ft.): 39	Diameter (in.): 12	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2
Emission Point: 00065		
Height (ft.): 38	Diameter (in.): 12	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2
Emission Point: 00067		
Height (ft.): 37	Diameter (in.): 10	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2
Emission Point: 00068		
Height (ft.): 37	Diameter (in.): 10	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2

**Item 11.3(From Mod 0):**

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

Emission Unit: U-PERS1

Emission Point: 00006		
Height (ft.): 29	Diameter (in.): 10	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: BESSIE



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Emission Point: 00013			
Height (ft.): 82	Diameter (in.): 22		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 1	
Emission Point: 00016			
Height (ft.): 82	Diameter (in.): 22		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 1	
Emission Point: 00017			
Height (ft.): 75	Diameter (in.): 18		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2	
Emission Point: 00039			
Height (ft.): 82	Diameter (in.): 10		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 1	
Emission Point: 00040			
Height (ft.): 75	Diameter (in.): 22		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2	
Emission Point: 00043			
Height (ft.): 82	Diameter (in.): 22		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 1	
Emission Point: 00062			
Height (ft.): 76	Diameter (in.): 12		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2	
Emission Point: 00063			
Height (ft.): 75	Diameter (in.): 12		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PLANT 2	
Emission Point: 00071			
Height (ft.): 75	Diameter (in.): 14		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: Plant 3	
Emission Point: 00072			
Height (ft.): 75	Diameter (in.): 6		
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: Plant 3	

**Item 11.4(From Mod 0):**

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

Emission Unit: U-TANK1

Emission Point: 00033	
Height (ft.): 36	Diameter (in.): 8



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NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: PERACID
Emission Point: 000T3		
Height (ft.): 18	Diameter (in.): 2	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: TANK FARM
Emission Point: 000T5		
Height (ft.): 18	Diameter (in.): 2	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: TANK FARM
Emission Point: 00T17		
Height (ft.): 1	Diameter (in.): 3	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: TANK FARM
Emission Point: 00T18		
Height (ft.): 17	Diameter (in.): 3	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: TANK FARM
Emission Point: 00T25		
Height (ft.): 1	Diameter (in.): 3	
NYTMN (km.): 4765.1	NYTME (km.): 179.8	Building: TANK FARM

**Condition 12: Process Definition By Emission Unit**  
**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 12.1(From Mod 3):**

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

Emission Unit: U-BOIL2

Process: BL2

Process Description:

This process encompasses the burning of natural gas or No. 2 fuel oil in two dual-fuel boilers to generate steam for facility heating and production use. It is anticipated that only one boiler will be operated while the remaining boiler is in standby mode.

Emission Source/Control: EP01D - Combustion

Design Capacity: 33 million BTUs per hour

Emission Source/Control: EP01E - Combustion

Design Capacity: 33 million BTUs per hour

**Item 12.2(From Mod 0):**

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

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Emission Unit: U-CELL1

Process: CEL

Process Description:

Electrolytic cells, used to manufacture ammonium and sodium persulfates, are vented in this process. This process occurs in both Plant 1 and Plant 2.

Emission Source/Control: 0EP19 - Process

Emission Source/Control: 0EP20 - Process

Emission Source/Control: 0EP21 - Process

Emission Source/Control: 0EP22 - Process

Emission Source/Control: 0EP23 - Process

Emission Source/Control: 0EP24 - Process

Emission Source/Control: 0EP25 - Process

Emission Source/Control: 0EP26 - Process

Emission Source/Control: 0EP27 - Process

Emission Source/Control: 0EP28 - Process

Emission Source/Control: 0EP65 - Process

Emission Source/Control: 0EP67 - Process

Emission Source/Control: 0EP68 - Process

**Item 12.3(From Mod 1):**

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

Emission Unit: U-PERS1

Process: PER

Process Description:

Ammonium, potassium and sodium persulfates are processed, blended, dried and packaged in this process. This process occurs in the Bessie building, Plant 1, Plant 2, and Plant 3.

Emission Source/Control: 0EP71 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER



Emission Source/Control: 0EP72 - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: EP06B - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: EP13B - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: EP13C - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: EP16B - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: EP16C - Control  
Control Type: WET SCRUBBER

Emission Source/Control: EP17B - Control  
Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: EP39B - Control  
Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: EP40B - Control  
Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: EP43B - Control  
Control Type: WET SCRUBBER

Emission Source/Control: EP43C - Control  
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: EP62B - Control  
Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: EP63B - Control  
Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: EP02A - Process

Emission Source/Control: EP02B - Process

Emission Source/Control: EP06A - Process

Emission Source/Control: EP13A - Process

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Emission Source/Control: EP16A - Process

Emission Source/Control: EP17A - Process

Emission Source/Control: EP39A - Process

Emission Source/Control: EP40A - Process

Emission Source/Control: EP43A - Process

Emission Source/Control: EP62A - Process

Emission Source/Control: EP63A - Process

**Item 12.4(From Mod 0):**

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

Emission Unit: U-TANK1

Process: TNK

Process Description:

Peracetic acid production equipment and raw material storage tanks are vented in this process. This process occurs in the peracid building as well as the tank farm.

Emission Source/Control: 0EP33 - Process

Emission Source/Control: 0EPT3 - Process

Emission Source/Control: 0EPT5 - Process

Emission Source/Control: EPT17 - Process

Emission Source/Control: EPT18 - Process

Emission Source/Control: EPT25 - Process

**Condition 13: Compliance Demonstration**

**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 212.9(b)**

**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PERS1 Emission Point: 00017

Process: PER Emission Source: EP17A

**New York State Department of Environmental Conservation**

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**Facility DEC ID: 9146400040**



Regulated Contaminant(s):

CAS No: 007664-41-7 AMMONIA

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

An ammonia absorber must be operated to recover and control ammonia emissions whenever the persulfate production process is operating. The pH of the process solution leading into the ammonia absorber is automatically and continuously monitored. If the pH reaches the established set point, the computerized process control system sounds an alarm and an operator adds sulfuric acid to lower the pH. The absorber must be operated at a pH of less than 4.0 to maintain a removal efficiency of at least 94%. The control system also employs low flow alarms to ensure that the absorber is receiving at least a nominal solution flow. The ammonia recovered by the absorber is reused in the persulfate production process. The absorber and continuous solution flow monitoring system must be operated and maintained in accordance with manufacturer's recommendations.

All records are to be kept on site for a period of two years and made available to Department representatives during normal business hours.

Parameter Monitored: SOLUTION

Upper Permit Limit: 4.0 pH (STANDARD) units

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 14: Compliance Demonstration**

**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 212.9(b)**

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PERS1 Emission Point: 00039



**New York State Department of Environmental Conservation**

**Permit ID: 9-1464-00040/00110**

**Facility DEC ID: 9146400040**

Process: PER

Emission Source: EP39A

Regulated Contaminant(s):

CAS No: 007664-41-7 AMMONIA

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

An ammonia absorber must be operated to recover and control ammonia emissions whenever the persulfate production process is operating. The pH of the process solution leading into the ammonia absorber is automatically and continuously monitored. If the pH reaches the established set point, the computerized process control system sounds an alarm and an operator adds sulfuric acid to lower the pH. The absorber must be operated at a pH of less than 4.0 to maintain a removal efficiency of at least 94%. The control system also employs low flow alarms to ensure that the absorber is receiving at least a nominal solution flow. The ammonia recovered by the absorber is reused in the persulfate production process. The absorber and continuous solution flow monitoring system must be operated and maintained in accordance with manufacturer's recommendations.

All records are to be kept on site for a period of two years and made available to Department representatives during normal business hours.

Parameter Monitored: SOLUTION

Upper Permit Limit: 4.0 pH (STANDARD) units

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 15: Compliance Demonstration**

**Effective between the dates of 06/09/2004 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 212.9(b)**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:



**New York State Department of Environmental Conservation**

**Permit ID: 9-1464-00040/00110**

**Facility DEC ID: 9146400040**

Emission Unit: U-PERS1    Emission Point: 00040  
Process: PER                    Emission Source: EP40A

Regulated Contaminant(s):  
CAS No: 007664-41-7    AMMONIA

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

An ammonia absorber must be operated to recover and control ammonia emissions whenever the persulfate production process is operating. The pH of the process solution leading into the ammonia absorber is automatically and continuously monitored. If the pH reaches the established set point, the computerized process control system sounds an alarm and an operator adds sulfuric acid to lower the pH. The absorber must be operated at a pH of less than 4.0 to maintain a removal efficiency of at least 94%. The control system also employs low flow alarms to ensure that the absorber is receiving at least a nominal solution flow. The ammonia recovered by the absorber is reused in the persulfate production process. The absorber and continuous solution flow monitoring system must be operated and maintained in accordance with manufacturer's recommendations.

All records are to be kept on site for a period of two years and made available to Department representatives during normal business hours.

Parameter Monitored: SOLUTION

Upper Permit Limit: 4.0 pH (STANDARD) units

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY