



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1464-00040/00110
Effective Date: 08/01/2015 Expiration Date: 07/30/2025

Permit Issued To: PEROXYCHEM LLC
1735 MARKET ST
PHILADELPHIA, PA 19103

Contact: DAVE VANCE
PEROXYCHEM LLC
35 SAWYER AVE
TONAWANDA, NY 14150
(716) 879-0401

Facility: PEROXYCHEM LLC
35 SAWYER AVE
TONAWANDA, NY 14150

Contact: THOMAS J KORALEWSKI
PEROXYCHEM LLC
35 SAWYER AVE
TONAWANDA, NY 14150
(716) 879-0499

Description:
Peroxychem LLC operates a chemical manufacturing facility in the Town of Tonawanda, Erie County. Persulfates and peracetic acid are produced using batch and continuous processes. The facility has been organized into four emission units (U-BOIL2, U-PERS1, U-CELL1, and U-TANK1) for the purposes of this permit.

U-BOIL2 consists of two 800 HP Cleaver Brooks CB-4WI dual fuel boilers. The boilers can burn either natural gas or #2 fuel oil but will be permanently powered by natural gas only due to the removal of the fuel oil tank. Each boiler is rated at 33 mmBTU/hr and were installed in 2006 as replacements for three existing boilers which were shut down permanently but not removed. The boilers are subject to 40 CFR Subpart Dc which includes emission standards for sulfur dioxide, particulates, and opacity. Since the boilers will no longer use fuel oil the potential-to-emit (PTE) of sulfur dioxide (SO₂) is greatly reduced. The SO₂ emission cap has been removed from the permit in this permit modification.

U-CELL1 - This emission unit consists of electrochemical production cells for the manufacture of ammonium and sodium persulfates in Plants 1 and 2. This modification included the addition of three new cell sections.

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U-PERS1 - 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.

U-TANK1 - 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.

Particulate emissions from the facility are regulated under 6 NYCRR Parts 212-1.6(a) and 212-2.4(b). The facility is restricted from creating emissions which have an average opacity during any six consecutive minutes of 20% or greater. The facility also has a particulate emission limit of 0.05 grains per dry standard cubic foot of exhaust gas. Peroxychem LLC must assure compliance with these particulate standards by following standard operating procedures and manufacturer's recommended maintenance requirements, and by performing weekly visible emissions observations of all emissions points.

Ammonia absorbers are used to recover and control ammonia emissions from the persulfate production process. The absorber must be operated at a pH of less than 4.0 to maintain a removal efficiency of at least 90% in compliance with 6 NYCRR Part 212-2.3(b).

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

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 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

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 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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.

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

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (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 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-1464-00040/00110

Facility DEC ID: 9146400040



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: PEROXYCHEM LLC
1735 MARKET ST
PHILADELPHIA, PA 19103

Facility: PEROXYCHEM LLC
35 SAWYER AVE
TONAWANDA, NY 14150

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

Permit Effective Date: 08/01/2015

Permit Expiration Date: 07/30/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 211.1: Air pollution prohibited
- 2 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 3 6 NYCRR 212-2.4 (b): Compliance Demonstration

Emission Unit Level

EU=U-BOIL2

- 4 6 NYCRR 227-1.3 (a): Compliance Demonstration
- 5 40CFR 60.43c(c), NSPS Subpart Dc: Compliance Demonstration
- 6 40CFR 60.43c(d), NSPS Subpart Dc: Enforceability of particulate matter and opacity standards.
- 7 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration
- 8 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 9 ECL 19-0301: Contaminant List
- 10 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 11 6 NYCRR Subpart 201-5: Emission Unit Definition
- 12 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 13 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 14 6 NYCRR 211.2: Visible Emissions Limited
- 15 6 NYCRR 212-2.3 (b): Compliance Demonstration

Emission Unit Level

- 16 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 17 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



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: Air pollution prohibited



Effective between the dates of 08/01/2015 and 07/30/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 1.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. 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.

Condition 2: Compliance Demonstration
Effective between the dates of 08/01/2015 and 07/30/2025

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

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 212-1.6(a) opacity standard. The permittee 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.

The permittee will conduct weekly visible emissions observations of all particulate-emitting emission points while the associated processes are in operation. 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 from a process source.

If visible emissions above those that are normal and in compliance with Section 212-1.6(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

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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.

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

Condition 3: Compliance Demonstration
Effective between the dates of 08/01/2015 and 07/30/2025

Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility is subject to the 6NYCRR Part 212-2.4(b) particulate limit of 0.05 grains per dry standard cubic foot of exhaust gas. The permittee 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



**** Emission Unit Level ****

Condition 4: Compliance Demonstration
Effective between the dates of 08/01/2015 and 07/30/2025

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

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

Item 4.2:

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.

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 5: Compliance Demonstration
Effective between the dates of 08/01/2015 and 07/30/2025

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

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 5.2:

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 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

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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 6: Enforceability of particulate matter and opacity standards.

Effective between the dates of 08/01/2015 and 07/30/2025

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

Item 6.1:

This Condition applies to Emission Unit: U-BOIL2

Item 6.2:

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 7: Compliance Demonstration

Effective between the dates of 08/01/2015 and 07/30/2025

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

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

Item 7.2:

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.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration

Effective between the dates of 08/01/2015 and 07/30/2025

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

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOIL2

Item 8.2:

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 - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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 9: Contaminant List
Effective between the dates of 08/01/2015 and 07/30/2025



Applicable State Requirement:ECL 19-0301

Item 9.1:

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

**Condition 10: Malfunctions and start-up/shutdown activities
Effective between the dates of 08/01/2015 and 07/30/2025**

Applicable State Requirement:6 NYCRR 201-1.4

Item 10.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that

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such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 11: Emission Unit Definition
Effective between the dates of 08/01/2015 and 07/30/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 11.1:

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 boilers. The boilers burn natural gas and are each rated at 33 mmBTU/hr.

Building(s): BOILER

Item 11.2:

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

Emission Unit: U-CELL1

Emission Unit Description:

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 11.3:

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 11.4:

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 12: Renewal deadlines for state facility permits
Effective between the dates of 08/01/2015 and 07/30/2025

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 12.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 13: Compliance Demonstration
Effective between the dates of 08/01/2015 and 07/30/2025

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 14: Visible Emissions Limited
Effective between the dates of 08/01/2015 and 07/30/2025

Applicable State Requirement:6 NYCRR 211.2



Item 14.1:

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.

Condition 15: Compliance Demonstration
Effective between the dates of 08/01/2015 and 07/30/2025

Applicable State Requirement:6 NYCRR 212-2.3 (b)

Item 15.1:

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

Emission Unit: U-PERS1	Emission Point: 00017
Process: PER	Emission Source: EP17A
Emission Unit: U-PERS1	Emission Point: 00039
Process: PER	Emission Source: EP39A
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 90%. 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

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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

**** Emission Unit Level ****

Condition 16: Emission Point Definition By Emission Unit Effective between the dates of 08/01/2015 and 07/30/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 16.1:

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 16.2:

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

NYTMN (km.): 4765.1

NYTME (km.): 179.8

Building: PLANT 2

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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: 00029			
Height (ft.): 31	Diameter (in.): 14		
NYTMN (km.): 4765.318	NYTME (km.): 179.819	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	

Item 16.3:

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	
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	

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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 16.4:

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		
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		

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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 17: Process Definition By Emission Unit
Effective between the dates of 08/01/2015 and 07/30/2025**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1:

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 two 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 17.2:

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

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: E19A1 - Process

Emission Source/Control: E19A2 - Process

Emission Source/Control: E20A1 - Process

Emission Source/Control: E20A2 - Process

Emission Source/Control: E21A1 - Process



- Emission Source/Control: E21A2 - Process
- Emission Source/Control: E22A1 - Process
- Emission Source/Control: E22A2 - Process
- Emission Source/Control: E23A1 - Process
- Emission Source/Control: E23A2 - Process
- Emission Source/Control: E24A1 - Process
- Emission Source/Control: E25A1 - Process
- Emission Source/Control: E25A2 - Process
- Emission Source/Control: E26A1 - Process
- Emission Source/Control: E26A2 - Process
- Emission Source/Control: E27A1 - Process
- Emission Source/Control: E27A2 - Process
- Emission Source/Control: E28A1 - Process
- Emission Source/Control: E28A2 - Process
- Emission Source/Control: E29A1 - Process
- Emission Source/Control: E29A2 - Process
- Emission Source/Control: E29A3 - Process
- Emission Source/Control: E65A1 - Process
- Emission Source/Control: E67A1 - Process
- Emission Source/Control: E67A2 - Process

Item 17.3:

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.

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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 17.4:

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

