

**New York State Department of Environmental Conservation  
Facility DEC ID: 9146400164**



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
9-1464-00164/00117  
Mod 0 Effective Date: 06/04/2002 Expiration Date: 06/04/2007  
Mod 1 Effective Date: 01/27/2003 Expiration Date: 06/04/2007  
Mod 2 Effective Date: 06/03/2003 Expiration Date: 06/04/2007  
Mod 4 Effective Date: 09/06/2005 Expiration Date: 06/04/2007

Permit Issued To: 3M CO  
3M CENTER BOX 33331  
SAINT PAUL, MN 55133-3331

Contact: TAMERA M WITER  
3M COMPANY  
42-2E-27 PO BOX 33331  
SAINT PAUL, MN 55133-3331  
(651) 778-5251

Facility: 3M TONAWANDA  
305 SAWYER AVE  
TONAWANDA, NY 14150

Contact: GREGORY A STUBBS  
3M TONAWANDA  
305 SAWYER AVE  
TONAWANDA, NY 14150  
(716) 871-6281

Description: This permit, modification #4, addresses the installation of a Thermal Oxidizer on emission point SEPAR to control Volatile Organic Compounds and Hazardous Air Pollutant emissions.

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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:            DAVID S DENK  
   DIVISION OF ENVIRONMENTAL PERMITS  
   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 and Modifications  
Applications for Permit Renewals and Modifications  
Applications for Permit Renewals and Modifications  
Permit Modifications, Suspensions and Revocations by the Department  
Permit Modifications, Suspensions and 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



**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

**For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions**

**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 2-1: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 2-1.1:**

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 2-1.2:**

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 2-1.3:**



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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 1-1: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 1-1.1:**

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

**Item 1-1.2:**

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

**Item 1-1.3:**

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

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

**Expired by Mod No: 1**

**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.

**Condition 2-2: Permit Modifications, Suspensions and Revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.14**

**Item 2-2.1:**

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,



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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.

**Condition 1-2: Permit Modifications, Suspensions and Revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.14**

**Item 1-2.1:**

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

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

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

**Expired by Mod No: 1**

**Item 4.1:**

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

**\*\*\*\* 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

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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 - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: 3M CO  
3M CENTER BOX 33331  
SAINT PAUL, MN 55133-3331

Facility: 3M TONAWANDA  
305 SAWYER AVE  
TONAWANDA, NY 14150

Authorized Activity By Standard Industrial Classification Code:  
2821 - PLASTICS MATERIALS AND RESINS

Mod 0 Permit Effective Date: 06/04/2002

Permit Expiration Date: 06/04/2007

Mod 1 Permit Effective Date: 01/27/2003

Permit Expiration Date: 06/04/2007

Mod 2 Permit Effective Date: 06/03/2003

Permit Expiration Date: 06/04/2007

Mod 4 Permit Effective Date: 09/06/2005

Permit Expiration Date: 06/04/2007



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 4-1 6NYCRR 201-6.5(a)(7): Fees
- 1-1 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 1-2 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 1-3 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 1-4 6NYCRR 201-6.5(e): Compliance Certification
- 29 6NYCRR 202-2.1: Compliance Certification
- 30 6NYCRR 202-2.5: Recordkeeping requirements
- 4-2 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 4-3 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 4-4 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 4-5 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 4-6 40CFR 68: Accidental release provisions.
- 23 6NYCRR 201-6: Emission Unit Definition
- 27 6NYCRR 201-6.5(g): Non Applicable requirements

**Emission Unit Level**

- 38 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 39 6NYCRR 201-6: Process Definition By Emission Unit

**EU=U-BOILS**

- 1-9 40CFR 60.7(a), NSPS Subpart A: Date of construction notification.
- 1-6 40CFR 60.42c(d), NSPS Subpart Dc: Compliance Certification

**EU=U-BOILS,Proc=279**

- 1-7 40CFR 60.11(e)(1), NSPS Subpart A: Compliance Certification
- 1-8 40CFR 60.44c(h), NSPS Subpart Dc: Compliance Certification

**EU=U-CONVT,Proc=277**

- 2-4 6NYCRR 228.7: Compliance Certification

**EU=U-MAKOT**

- 44 6NYCRR 212.10: Compliance Certification

**EU=U-MAKOT,Proc=OTH**

- 2-5 6NYCRR 212.4: Compliance Certification

**EU=U-NCS01**

- 2-6 6NYCRR 212.10: Compliance Certification

**EU=U-NCS01,EP=NCS01**



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2-7 6NYCRR 212.6: Compliance Certification  
2-8 6NYCRR 212.9: Compliance Certification  
2-10 6NYCRR 257-10: Compliance Certification

**EU=U-NCS01,EP=NCS01,Proc=NCS,ES=000C1**

54 6NYCRR 212.4: Compliance Certification

**EU=U-NCS01,EP=NCS01,Proc=NCS,ES=000C2**

55 6NYCRR 212.4: Compliance Certification

**EU=U-NCS01,EP=NCS01,Proc=NCS,ES=0NSRU**

2-12 6NYCRR 212.11(b)(3): Compliance Certification

**EU=U-NCS01,EP=NCS01,Proc=NCS,ES=BOIL4**

58 6NYCRR 212.11(b)(5): Compliance Certification

59 6NYCRR 212.11(b)(5): Compliance Certification

**EU=U-NCS01,EP=NCS01,Proc=NCS,ES=SCRUB**

60 6NYCRR 201-6: Compliance Certification

61 6NYCRR 201-6: Compliance Certification

62 6NYCRR 201-6: Compliance Certification

63 6NYCRR 212.9(b): Compliance Certification

**EU=U-PTSCL**

64 6NYCRR 226.3(a): Compliance Certification

65 6NYCRR 226.4(a): Compliance Certification

**EU=U-SEPAR**

4-7 6NYCRR 212.11: Compliance Certification

**EU=U-SEPAR,EP=SEPAR**

4-8 6NYCRR 212.5(d): Compliance Certification

1-10 6NYCRR 212.10(c)(4)(i): Compliance Certification

1-11 6NYCRR 212.10(c)(4)(i): Compliance Certification

1-12 6NYCRR 212.10(c)(4)(i): Compliance Certification

4-9 6NYCRR 212.11(b)(1): Compliance Certification

**EU=U-TANKS,EP=CS20A,Proc=266,ES=CS200**

66 6NYCRR 229.3(e): Compliance Certification

**EU=U-THERM**

67 6NYCRR 227.2(b)(1): Compliance Certification

**EU=U-THERM,EP=E0000,Proc=254**

68 6NYCRR 225-1.2: Compliance Certification

69 6NYCRR 225-1.2: Compliance Certification



**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1-13 ECL 19-0301: Contaminant List
- 70 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 4-10 6NYCRR 201-7: Facility Permissible Emissions
- \*4-11 6NYCRR 201-7: Capping Monitoring Condition
- \*4-12 6NYCRR 201-7: Capping Monitoring Condition
- \*4-13 6NYCRR 201-7: Capping Monitoring Condition
- \*4-14 6NYCRR 201-7: Capping Monitoring Condition
- 74 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

**EU=U-BOILS**

- 1-14 6NYCRR 227-1.2(a)(2): Compliance Demonstration

NOTE: \* preceding the condition number indicates capping.



**FEDERALLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.**

**Item A: 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 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 B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)**

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to



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Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

**Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

**Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)**

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in



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order to maintain compliance with the conditions of this permit.

**Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**

This permit does not convey any property rights of any sort or any exclusive privilege.

**Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

**Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)**

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the

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Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)**

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

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

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.**

**Condition 4-1: Fees**

**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)**

**Item 4-1.1:**

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee



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schedule authorized by ECL 72-0302.

**Condition 1-1: Recordkeeping and reporting of compliance monitoring  
Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(c)**

**Item 1-1.1:**

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

**Condition 1-2: Monitoring, Related Recordkeeping, and Reporting  
Requirements.  
Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)**

**Item 1-2.1:**

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**Condition 1-3: Compliance Certification  
Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)**

**Item 1-3.1:**

The Compliance Certification activity will be performed for the Facility.

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**Item 1-3.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting

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requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. 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. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory



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requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2003.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-4: Compliance Certification**  
**Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(e)**

**Item 1-4.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-4.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to

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determine the compliance status of the facility as specified in any special permit terms or conditions; and  
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866

The address for the RAPCE is as follows:

270 Michigan Avenue  
Buffalo, NY 14203-2999

The address for the BCME is as follows:



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NYSDEC  
Bureau of Compliance Monitoring  
and Enforcement  
625 Broadway  
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2003.  
Subsequent reports are due on the same day each year

**Condition 29: Compliance Certification**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 202-2.1**

**Item 29.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 29.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:  
Emission statements shall be submitted on or before April  
15th each year for emissions of the previous calendar  
year.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due by April 15th for previous calendar year

**Condition 30: Recordkeeping requirements**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 202-2.5**

**Item 30.1:**

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department



upon request during normal business hours.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT  
TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]**

**Condition 4-2: Standard Requirement - Provide Information**  
**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)**

**Item 4-2.1:**

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 4-3: General Condition - Right to Inspect**  
**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)**

**Item 4-3.1:**

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring



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compliance with the permit or applicable requirements.

**Condition 4-4: Standard Requirements - Progress Reports**  
**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)**

**Item 4-4.1:**

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Condition 4-5: Off Permit Changes**  
**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)**

**Item 4-5.1:**

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

- (i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

**Condition 4-6: Accidental release provisions.**  
**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable Federal Requirement: 40CFR 68**

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**Replaces Condition(s) 2-3**

**Item 4-6.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
  - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center  
C/O CSC  
8400 Corporate Dr  
Carrollton, Md. 20785

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 23: Emission Unit Definition**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

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

**Item 23.1(From Mod 4):**

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

Emission Unit: U-NCS01

Emission Unit Description:

This unit vents to emission point NCS01 (main stack) and consists of low concentration emission sources associated with sponge manufacturing, sources vented to the solvent recovery unit, and the B2 process. Uncontrolled sources include viscose holding equipment, sponge block, ML washes, evaporator concentrating weak ML and laminator wash tables. Sources venting to the solvent recovery unit include: the laminator acid washes, the viscose shredders, the block sponge mixers, the EC oven and reclaimed



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viscose/sponge cook tanks. The emissions from the B2 process are abated by a heat recovery industrial boiler and caustic scrubber. The emissions from the scrubber are vented to emission point NCS01.

Building(s): LCEMS

**Item 23.2(From Mod 4):**

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

Emission Unit: U-SBOIL

Emission Unit Description:

Package boiler to provide steam for the new solvent recovery unit. Dual fuel boiler with natural gas as the primary fuel and no. 2 fuel oil as the secondary fuel. The maximum rated heat input is 9.6 mmbtu/hr.

Building(s): CUC

**Item 23.3(From Mod 4):**

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

Emission Unit: U-SEPAR

Emission Unit Description:

The process technology converts contaminants in the salt reclamation process by oxidation to sulfate and carbon dioxide. The B2 process, including the accompanying scrubber and BOIL4, will be replaced by this U-SEPAR process technology. The most important condition that applies to the B2 process which will still be applicable once USEPAR is operable is the 71.26 tons of Sulfur Dioxide per year emission limit under 40 cfr 52.21, subpart A, the 337.9 ton of VOC per year limit under 6 NYCRR part 231-2, and the 33.12 tons of Hydrogen Sulfide per year emission limits under 40 cfr 52.21, subpart A. These limits are applicable to B2 and the new technology.

Building(s): CUC

**Item 23.4(From Mod 2):**

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

Emission Unit: U-BOILS

Emission Unit Description:

Two new boilers will be installed to supply steam for plant use and will replace Boilers identified in emission unit U THERM. The new boilers are rated for: 63.2 mmBTU/hr when burning No. 2 oil and 60.4 mmBTU/hr when burning natural gas. Upon start up of UBOILS and shutdown of U THERM conditions applicable for monitoring plant wide



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Sulfur dioxide emissions under 40 cfr 52.21, subpart A, will apply to UBOILS. Once UATHERM is shut down conditions applicable to UATHERM such as the particulate standard under 6 NYCRR part 227.2(b)(1) and the sulfur standards under 6 NYCRR 225-1.2 will no longer apply.

Building(s): CUC

**Item 23.5(From Mod 2):**

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

Emission Unit: U-CONVT

Emission Unit Description:

The emission unit consists of coaters used to apply adhesive. The coater also utilizes a heating unit.

Building(s): 1-34

**Item 23.6(From Mod 0):**

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

Emission Unit: U-DRYNG End Date: 01/16/2003

Emission Unit Description:

This emission unit consists of drying ovens and kiln (1.5 mmbtu/hr). The only pollutant emitted from the dryers is ammonia. The kiln also emits ammonia as well as the products of combustion from natural gas usage. Actual emissions of ammonia from each source is less than 2.5 tpy. There is no control equipment.

Building(s): 1-50

**Item 23.7(From Mod 0):**

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

Emission Unit: U-FUGIT End Date: 01/16/2003

Emission Unit Description:

Fugitive emissions from piping to the carbon disulfide storage tank and the solvent recovery unit. This is a fugitive source, so no emission point is listed. After start up of the new sru fugitive emissions are expected to remain essentially the same. There are currently no applicable requirements for this emission unit.

Building(s): TSP

**Item 23.8(From Mod 2):**

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

Emission Unit: U-MAKOT

Emission Unit Description:



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Existing sponge making consists of viscose/salt production and block making. This emission unit consists of the sources associated with sponge making that do not vent to the main stack (NCS01).

Building(s): 1-23  
1-29  
4  
4V  
LCENMS

**Item 23.9(From Mod 0):**

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

Emission Unit: U-PTSCL

Emission Unit Description:

Three exempt parts cleaners. These sources are exempt, but are subject to an applicable requirement. They are not directly connected to a stack, so no emission point is included.

Building(s): MAINT

**Item 23.10(From Mod 0):**

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

Emission Unit: U-PUMP0

Emission Unit Description:

Diesel fuel powered backup pump.

Building(s): FPH1

**Item 23.11(From Mod 2):**

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

Emission Unit: U-TANKS

Emission Unit Description:

This emission unit includes the non-exempt storage tanks at the facility. The carbon disulfide tank utilizes a water blanket to control emissions and is not subject to the requirements of 40 cfr 60 subpart Kb.

Building(s): CS200  
NAOH0  
NO600  
TANKS

**Item 23.12(From Mod 2):**

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

Emission Unit: U-THERM



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**Emission Unit Description:**

Three boilers with natural gas as primary fuel. # 6 and #2 oil backup. Boilers 1 and 2 are each rated at 10 mmbtu/hr heat input, boiler 3 is rated at 20.9 mmbtu/hr.

Building(s): 1-30

**Condition 27: Non Applicable requirements**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 201-6.5(g)**

**Item 27.1:**

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

40CFR 60-Kb

Emission Unit: UTANKS Emission Point: CS20A

Reason: The Carbon Disulfide Tank minimizes emissions by maintaining a layer of water in the head space of the storage tank. Carbon Disulfide is heavier than water and not readily miscible in water. 40 CFR 60 subpart Kb applicability is based on vapor pressure of the surface material in the tank which, in this case, is water. The USEPA has determined the water is in contact with the atmosphere and the vapor pressure is below the threshold and therefore the requirements of Kb are not applicable.

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

**Condition 38: Emission Point Definition By Emission Unit**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

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

**Item 38.1(From Mod 4):**

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

Emission Unit: U-NCS01

Emission Point: NCS01

Height (ft.): 197

Diameter (in.): 60

NYTMN (km.): 4765.328 NYTME (km.): 180.486 Building: LCEMS



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**Item 38.2(From Mod 4):**

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

Emission Unit: U-SEPAR

Emission Point: SEPAR

Height (ft.): 50

Diameter (in.): 20

Building: CUC

**Item 38.3(From Mod 1):**

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

Emission Unit: U-BOILS

Emission Point: BOIL1

Height (ft.): 47

Diameter (in.): 36

Building: CUC

Emission Point: BOIL2

Height (ft.): 47

Diameter (in.): 36

Building: CUC

**Item 38.4(From Mod 0):**

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

Emission Unit: U-CONVT

Emission Point: BND00

Height (ft.): 28

Diameter (in.): 16

NYTMN (km.): 4765.307 NYTME (km.): 180.323 Building: 1-34

**Item 38.5(From Mod 0):**

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

Emission Unit: U-DRYNG

Emission Point: D0001

Removal Date: 01/16/2003

Height (ft.): 27

Diameter (in.): 8

NYTMN (km.): 4765.356 NYTME (km.): 180.476 Building: 1-50

Emission Point: D0002

Removal Date: 01/16/2003

Height (ft.): 26

Diameter (in.): 8

NYTMN (km.): 4765.358 NYTME (km.): 180.479 Building: 1-50

Emission Point: D0003

Removal Date: 01/16/2003

Height (ft.): 21

Diameter (in.): 8



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NYTMN (km.): 4765.36 NYTME (km.): 180.483 Building: 1-50

Emission Point: KI00A Removal Date: 01/16/2003  
Height (ft.): 18 Length (in.): 21 Width (in.): 21  
NYTMN (km.): 4765.386 NYTME (km.): 180.528 Building: 1-50

Emission Point: KI00B Removal Date: 01/16/2003  
Height (ft.): 18 Length (in.): 21 Width (in.): 21  
NYTMN (km.): 4765.387 NYTME (km.): 180.53 Building: 1-50

Emission Point: KI00C Removal Date: 01/16/2003  
Height (ft.): 18 Length (in.): 21 Width (in.): 21  
NYTMN (km.): 4765.389 NYTME (km.): 180.532 Building: 1-50

Emission Point: KI00D Removal Date: 01/16/2003  
Height (ft.): 18 Length (in.): 21 Width (in.): 21  
NYTMN (km.): 4765.39 NYTME (km.): 180.526 Building: 1-50

Emission Point: KI00E Removal Date: 01/16/2003  
Height (ft.): 18 Length (in.): 21 Width (in.): 21  
NYTMN (km.): 4765.391 NYTME (km.): 180.528 Building: 1-50

Emission Point: KI00F Removal Date: 01/16/2003  
Height (ft.): 18 Length (in.): 21 Width (in.): 21  
NYTMN (km.): 4765.393 NYTME (km.): 180.53 Building: 1-50

**Item 38.6(From Mod 0):**

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

Emission Unit: U-MAKOT

Emission Point: AGERM  
Height (ft.): 30 Diameter (in.): 24  
Building: 4

Emission Point: B3000  
Height (ft.): 30 Diameter (in.): 24  
Building: 4

Emission Point: FB000 Removal Date: 11/26/2001  
Height (ft.): 27 Diameter (in.): 24  
NYTMN (km.): 4765.367 NYTME (km.): 180.404 Building: 4

Emission Point: FB001 Removal Date: 11/26/2001  
Height (ft.): 23 Diameter (in.): 28  
NYTMN (km.): 4765.383 NYTME (km.): 180.431 Building: 4



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Emission Point: FN000  
Height (ft.): 32 Diameter (in.): 24  
NYTMN (km.): 4765.366 NYTME (km.): 180.409 Building: 4

Emission Point: FS000  
Height (ft.): 31 Diameter (in.): 20  
NYTMN (km.): 4765.362 NYTME (km.): 180.419 Building: 4

Emission Point: MMIX1  
Height (ft.): 30 Diameter (in.): 24  
Building: 4

Emission Point: MMIX2  
Height (ft.): 30 Diameter (in.): 24  
Building: 4

Emission Point: MMIX3  
Height (ft.): 30 Diameter (in.): 24  
Building: 4

Emission Point: SLG00  
Height (ft.): 21 Diameter (in.): 12  
NYTMN (km.): 4765.291 NYTME (km.): 180.486 Building: 4

**Item 38.7(From Mod 0):**

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

Emission Unit: U-PUMP0

Emission Point: PUMP0  
Height (ft.): 10 Diameter (in.): 1  
NYTMN (km.): 4765.36 NYTME (km.): 184.41 Building: FPH1

**Item 38.8(From Mod 2):**

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

Emission Unit: U-TANKS

Emission Point: ACID3  
Height (ft.): 13 Diameter (in.): 3  
Building: TANKS

Emission Point: BL004  
Height (ft.): 13 Diameter (in.): 3  
Building: TANKS

Emission Point: CS20A



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Height (ft.): 16                      Diameter (in.): 24  
NYTMN (km.): 4765.23    NYTME (km.): 180.486    Building: TANKS

Emission Point: CS20B  
Height (ft.): 16                      Diameter (in.): 8  
NYTMN (km.): 4765.232    NYTME (km.): 180.489    Building: TANKS

Emission Point: CS20C  
Height (ft.): 1                      Length (in.): 840                      Width (in.): 420  
NYTMN (km.): 4765.23    NYTME (km.): 180.487    Building: TANKS

Emission Point: NAOH0                      Removal Date: 04/01/2003  
Height (ft.): 1                      Diameter (in.): 3  
NYTMN (km.): 4765.255    NYTME (km.): 180.515    Building: NAOH0

Emission Point: NAOH7  
Height (ft.): 13                      Diameter (in.): 3  
NYTMN (km.): 4765.255    NYTME (km.): 180.515    Building: TANKS

Emission Point: NO600  
Height (ft.): 14                      Diameter (in.): 4  
NYTMN (km.): 4765.26    NYTME (km.): 180.452    Building: TANKS

**Item 38.9(From Mod 0):**

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

Emission Unit: U-THERM

Emission Point: E0000  
Height (ft.): 151                      Diameter (in.): 60  
NYTMN (km.): 4765.298    NYTME (km.): 180.43    Building: 1-30

**Condition 39: Process Definition By Emission Unit  
Effective between the dates of 06/04/2002 and 06/04/2007**

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

**Item 39.1(From Mod 4):**

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

Emission Unit: U-NCS01  
Process: NCS    Source Classification Code: 3-02-032-01  
Process Description:

This process vents to emission point NCS01 (main stack) and includes low concentration emission sources associated with sponge manufacturing. The sources venting to the SRU (Solvent Recovery System) are also part of this process.



Emission Source/Control: 00011 - Combustion

Emission Source/Control: 0NSRU - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00001 - Process

Emission Source/Control: 00002 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00004 - Process

Emission Source/Control: 00010 - Process

Emission Source/Control: 00011 - Process

Emission Source/Control: 00012 - Process

Emission Source/Control: 00020 - Process

Emission Source/Control: 00052 - Process

Emission Source/Control: 00060 - Process

Emission Source/Control: 00061 - Process

Emission Source/Control: 00062 - Process

Emission Source/Control: 00070 - Process

Emission Source/Control: 00071 - Process

Emission Source/Control: 00072 - Process

Emission Source/Control: 00080 - Process

Emission Source/Control: 00081 - Process

Emission Source/Control: 00082 - Process

Emission Source/Control: 00083 - Process

Emission Source/Control: 00100 - Process

Emission Source/Control: 00120 - Process

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Emission Source/Control: 00130 - Process

Emission Source/Control: 00140 - Process

Emission Source/Control: 00150 - Process

Emission Source/Control: 00151 - Process

Emission Source/Control: 00152 - Process

Emission Source/Control: 0NC01 - Process

Emission Source/Control: COT00 - Process

Emission Source/Control: MIX00 - Process

**Item 39.2(From Mod 4):**

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

Emission Unit: U-NCS01

Process: WAO

Source Classification Code: 3-01-810-01

Process Description:

The process technology converts contaminants in the waste liquor under pressure and temperature to sulfate and carbon dioxide. This process vents to emission point NCS01 only when in bypass which is defined in the Start up , shutdown and malfunction plan.

Emission Source/Control: WAO11 - Process

**Item 39.3(From Mod 4):**

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

Emission Unit: U-SBOIL

Process: SB2

Source Classification Code: 1-03-005-02

Process Description:

Combustion of no. 2 fuel oil in the solvent recovery unit boiler. The boiler provides steam to the solvent recovery unit and has a maximum heat input of 9.6 mmbtu/hr. No. 2 fuel oil is the backup fuel.

Emission Source/Control: SBOIL - Process

Design Capacity: 9.6 million Btu per hour

**Item 39.4(From Mod 4):**

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



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Emission Unit: U-SBOIL

Process: SBN

Source Classification Code: 1-03-006-02

Process Description:

Combustion of natural gas in the solvent recovery unit boiler. The boiler provides steam to the solvent recovery unit and has a maximum heat input of 9.6 mmbtu/hr. Natural gas is the primary fuel.

Emission Source/Control: SBOIL - Process

Design Capacity: 9.6 million Btu per hour

**Item 39.5(From Mod 4):**

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

Emission Unit: U-SEPAR

Process: SEP

Source Classification Code: 3-01-810-01

Process Description:

The process technology converts contaminants in the waste liquor under pressure and temperature to sulfate and carbon dioxide.

Emission Source/Control: SEP01 - Process

Design Capacity: 150 gallons per hour

**Item 39.6(From Mod 2):**

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

Emission Unit: U-BOILS

Process: 278

Source Classification Code: 1-02-006-02

Process Description:

Emission Source BOI01 and BOI02, two boilers rated at 60.4 mmbtu/hr boilers when firing natural gas as primary fuel.

Emission Source/Control: BOI01 - Combustion

Design Capacity: 60.4 million Btu per hour

Emission Source/Control: BOI02 - Combustion

Design Capacity: 60.4 million Btu per hour

**Item 39.7(From Mod 1):**

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

Emission Unit: U-BOILS

Process: 279

Source Classification Code: 1-03-005-01

Process Description:



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Emission Source BOI01 and BOI02, 2 boilers rated at 63.2 mmmbtu/hr when firing on # 2 low sulfur oil as backup to natural gas use.

Emission Source/Control: BOI01 - Combustion  
Design Capacity: 63.2 million Btu per hour

Emission Source/Control: BOI02 - Combustion  
Design Capacity: 63.2 million Btu per hour

**Item 39.8(From Mod 2):**

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

Emission Unit: U-CONVT

Process: 277

Source Classification Code: 4-02-013-10

Process Description:

This process consists of coaters used to apply adhesive.  
One of the coaters also utilizes a heater.

Emission Source/Control: BND01 - Process

Emission Source/Control: BND02 - Process

Emission Source/Control: BND03 - Process

**Item 39.9(From Mod 0):**

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

Emission Unit: U-DRYNG

Process: 275

Source Classification Code: 3-07-004-06

Process End Date: 1/16/2003

Process Description:

Three steam heated dryers and one natural gas fired kiln (1.5mmbtu/hr heat input). Certain types of sponges produced at the facility must be dried. Actual emissions are less than 2.5 tons per year for each emission source for each pollutant. The emission rate potential from each source is less than 1.0 lb/hr.

Emission Source/Control: D0001 - Process

Emission Source/Control: D0002 - Process

Emission Source/Control: D0003 - Process

Emission Source/Control: KI000 - Process



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Design Capacity: 1.5 million Btu per hour

**Item 39.10(From Mod 0):**

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

Emission Unit: U-FUGIT

Process: FUG

Source Classification Code: 3-02-032-01

Process End Date: 1/16/2003

Process Description:

Fugitive emissions resulting from piping at the solvent recovery unit, the carbon disulfide storage tank and the connecting piping. There are no applicable requirements, but emission calculations are included in the process emission summary and the attached spreadsheet to the application.

Emission Source/Control: FUGIT - Process

**Item 39.11(From Mod 2):**

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

Emission Unit: U-MAKOT

Process: OTH

Source Classification Code: 3-02-032-01

Process Description:

Sources in the sponge making process that do not vent to the main stack include: block mixer secondary exhausts, the sulfur sludge tank and the B3 tank. Particulate emissions from the two sponge mixer secondary exhausts, FN000, FS000, and FB000 are controlled by panel filters, fnpan, and fspan respectively. The other sources are uncontrolled. These sources are located on the main floor of buildings 1-21 sponge mixer area, and 1-29 sludge building. Sources associated with the laminators include the mass mixers (00110, 00111, 00112, 00113, 00114, 00115, 00116, 00117, 00118) and the viscose ageing room (00090). All of these sources will be located on the first floor of the laminator building and are uncontrolled.

Emission Source/Control: FBPAN - Control Removal Date: 01/16/2003

Control Type: MAT OR PANEL FILTER

Emission Source/Control: FNPAN - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: FSPAN - Control

Control Type: MAT OR PANEL FILTER



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Emission Source/Control: 00090 - Process  
Emission Source/Control: 00110 - Process  
Emission Source/Control: 00111 - Process  
Emission Source/Control: 00112 - Process  
Emission Source/Control: 00113 - Process  
Emission Source/Control: 00114 - Process  
Emission Source/Control: 00115 - Process  
Emission Source/Control: 00116 - Process  
Emission Source/Control: 00117 - Process  
Emission Source/Control: 00118 - Process  
Emission Source/Control: B3000 - Process  
Emission Source/Control: FB000 - Process Removal Date: 01/16/2003  
Emission Source/Control: FB001 - Process Removal Date: 01/16/2003  
Emission Source/Control: FN000 - Process  
Emission Source/Control: FS000 - Process  
Emission Source/Control: SLG00 - Process

**Item 39.12(From Mod 0):**

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

Emission Unit: U-PTSCL  
Process: PCL Source Classification Code: 3-09-011-01  
Process Description:  
Three parts cleaners. These are exempt sources because they use a solvent with a boiling point of over 300 degrees fahrenheit.

Emission Source/Control: PTSC1 - Process  
Emission Source/Control: PTSC2 - Process  
Emission Source/Control: PTSC3 - Process

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**Item 39.13(From Mod 0):**

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

Emission Unit: U-PUMP0

Process: PMP

Source Classification Code: 2-03-001-07

Process Description:

Diesel powered backup pump. This is an exempt source, but it is subject the opacity requirements in 6 nycrr part 227.

Actual emissions are less than 2.5 tons per year.

Emission Source/Control: PUMP0 - Combustion

Design Capacity: 340 horsepower (mechanical)

**Item 39.14(From Mod 2):**

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

Emission Unit: U-TANKS

Process: 266

Source Classification Code: 3-01-870-01

Process Description:

The NaOH7, ACID3, BLOO4, NO600 tanks each have one emission point associated with them, the CS203 tank has three. CS20A is the manway in the top of the tank, CS20B is the overflow pipe and CS20C is the dike where displaced water is aerated to remove carbon disulfide. Emissions from NAOH7 and NO600 (tank B9) are insignificant. The emissions from CS203 are included in the process emission summary. NO600 may be used to store no.6 fuel oil or no.2 fuel oil.

Emission Source/Control: WATBL - Control

Control Type: WATER SEAL

Emission Source/Control: ACID3 - Process

Design Capacity: 11,181 gallons

Emission Source/Control: BL004 - Process

Design Capacity: 12,944 gallons

Emission Source/Control: CS203 - Process

Design Capacity: 30,000 gallons

Emission Source/Control: NAOH7 - Process

Design Capacity: 42,943 gallons

Emission Source/Control: NO600 - Process

Design Capacity: 21,000 gallons

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**Item 39.15(From Mod 2):**

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

Emission Unit: U-THERM

Process: 253

Source Classification Code: 1-02-006-02

Process Description:

Combustion of natural gas in three boilers as the primary fuel. Boilers 1 and 2 are each rated at 10 mmbtu/hr, boiler 3 at 20.9 mmbtu/hr..

Emission Source/Control: 000CR - Combustion

Design Capacity: 10 million Btu per hour

Emission Source/Control: 000CS - Combustion

Design Capacity: 10 million Btu per hour

Emission Source/Control: 000CT - Combustion

Design Capacity: 20.9 million Btu per hour

**Item 39.16(From Mod 2):**

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

Emission Unit: U-THERM

Process: 254

Source Classification Code: 1-02-005-01

Process Description:

Combustion of no.2 fuel oil in three boilers as backup fuel. Boilers 1 and 2 are each rated at 10 mmbtu/hr, boiler 3 at 20.9 mmbtu/hr.

Emission Source/Control: 000CR - Combustion

Design Capacity: 10 million Btu per hour

Emission Source/Control: 000CS - Combustion

Design Capacity: 10 million Btu per hour

Emission Source/Control: 000CT - Combustion

Design Capacity: 20.9 million Btu per hour

**Item 39.17(From Mod 0):**

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

Emission Unit: U-THERM

Process: 255

Source Classification Code: 1-02-004-02

Process Description:

Combustion of No. 6 oil in three boilers as backup fuel



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Emission Source/Control: 000CR - Combustion  
Design Capacity: 10 million Btu per hour

Emission Source/Control: 000CS - Combustion  
Design Capacity: 10 million Btu per hour

Emission Source/Control: 000CT - Combustion  
Design Capacity: 20.9 million Btu per hour

**Condition 1-9: Date of construction notification.**  
**Effective between the dates of 01/27/2003 and 06/04/2007**

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

**Item 1-9.1:**

This Condition applies to Emission Unit: U-BOILS

**Item 1-9.2:**

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;
- 2) a notification of the anticipated date of initial start up, post marked not more than 60 days not less than 30 days prior to 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; and
- 7) a notification that continuous opacity monitoring system data results will be used to determine compliance with the applicable opacity standard during the performance test, post marked not less than 30 days prior to the performance test.



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**Condition 1-6: Compliance Certification**

**Effective between the dates of 01/27/2003 and 06/04/2007**

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

**Item 1-6.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILS

**Item 1-6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

On or after the date on which the initial performance test is completed or required to be completed under section 60.8 of this part, no owner or operator of an affected facility that combusts oil shall combust oil with a sulfur content of 0.5 percent by weight.

The Sulfur dioxide emissions from this emission unit must also be counted towards the facility SO<sub>2</sub> cap of 71.26 tons per year listed in a facility condition under 40 CFR 52.21 Subpart A.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NUMBER 2 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.5 percent

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

Subsequent reports are due every 12 calendar month(s).

**Condition 1-7: Compliance Certification**

**Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable Federal Requirement: 40CFR 60.11(e)(1), NSPS Subpart A**

**Item 1-7.1:**

The Compliance Certification activity will be performed for:



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Emission Unit: U-BOILS

Process: 279

**Item 1-7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

For the purpose of demonstrating initial compliance (for the opacity standard while burning fuel oil), opacity observations shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated but no later than 180 days after initial start up of the facility. 3M must supply the EPA administrator and NYSDEC written or electronic notification of the anticipated date of conducting the opacity observations. The notification shall be post marked not less than 30 days prior to such date. A report of results is required within 45 days of such date. Opacity when firing oil will be checked once per day or as necessary and a record of observations maintained. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, snow). The results of each observation must be recorded in a bound logbook or other format acceptable to the department. The following data must be recorded for each stack:- weather condition;- was a plume observed? This logbook must be retained at the facility for five years after the date of last entry. If the operator observes any visible emissions (other than steam), then a method 9 analysis (based on a 6-minute avg.) of the affected emission point(s) must be conducted within two business days of such occurrence. The results of the method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one business day of performing the method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department of acceptance.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE



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Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-8: Compliance Certification**

**Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable Federal Requirement: 40CFR 60.44c(h), NSPS Subpart Dc**

**Item 1-8.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILS

Process: 279

**Item 1-8.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner and/or operator must demonstrate compliance with the requirements of 40 cfr 60.42c(h). Facilities demonstrating compliance using the fuel supplier certification, for sulfur-in-fuel limitations (based on a percent by weight of sulfur in the fuel), shall submit the certification in accordance with the provisions of 40 cfr 60.48c(f)(1) which for distillate oil are: The name of the oil supplier; and a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 cfr 60.41c.

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.5 percent by weight

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

**Condition 2-4: Compliance Certification**

**Effective between the dates of 06/03/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 228.7**

**Replaces Condition(s) 43**



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**Item 2-4.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-CONVT

Process: 277

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 2-4.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This process consists of coaters used to apply adhesive. One of the coaters utilizes a heater. This operation is regulated under 6 NYCRR part 228.7, table 1, and is limited to 2.90 pounds of VOC per gallon of coating as applied. MSDS or product data sheets specifying VOC content will be used to demonstrate compliance. Solvent used to adjust adhesive viscosity will be counted towards the calculation of VOC per gallon.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

**Condition 44: Compliance Certification**

**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.10**

**Item 44.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-MAKOT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

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**Item 44.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The existing sources in this emission unit all have low emissions (ERP<3.0lbs/hr). Existing emission points with an ERP <3.0lbs/hr are not required to perform a RACT analysis. Appropriate records documenting thruput and estimated emissions will be kept to insure emissions do not exceed 3 pounds/hour. These records may use daily production rates to determine hourly emission rates at each emission point. RACT must be addressed before emissions can exceed 3 pounds per hour.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

**Condition 2-5: Compliance Certification**

**Effective between the dates of 06/03/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.4**

**Replaces Condition(s) 45**

**Item 2-5.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-MAKOT

Process: OTH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 2-5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sources of particulate matter in this process all employ panel filters to control particulate emissions. Each emission point is limited to 0.05 grs/dscf of



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particulate emission under 6 NYCRR part 212.4. The filters will be periodically inspected and typically replaced on a weekly basis. Records of filter replacement and equipment maintenance will be kept on site.

Monitoring Frequency: WEEKLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2003.  
Subsequent reports are due every 6 calendar month(s).

**Condition 2-6: Compliance Certification**  
**Effective between the dates of 06/03/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.10**

**Replaces Condition(s) 47**

**Item 2-6.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 2-6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Part 212.10 requires RACT (Reasonable Available Control Technology) for major sources of VOC (Volatile Organic Compounds). Part 212.10(c)(4)(i) defines RACT for VOC emission points which are equipped with a capture and control device with an overall removal efficiency to be at least 81 %. Emission point NCS01 emits approximately 96 % of the VOC emissions from the plant and several sources vent to this stack. These can be broken down into three groups: the SRU (Solvent Recovery System) , the B squared process and several low concentration emission sources associated with sponge making. This condition will lay out the method for determining compliance with the 81% overall control requirement.

SRU- A CEM (Continuous Emissions Monitor) for Carbon Disulfide, Carbonyl Sulfide (VOC's), and Sulfur Dioxide(SO<sub>2</sub>) is maintained at the outlet of emission point

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NCS01 to demonstrate compliance with the requirements of Part 212.10, 81% overall control for VOC's, as well as part 231-2 conditions for CS<sub>2</sub> specified elsewhere in this permit. A CEM for Carbon Disulfide is also maintained at the inlet and outlet of the SRU for the purpose of determining removal efficiency for VOC's. The CEM data collected for Carbon Disulfide in conjunction with a 96% capture efficiency demonstrated during the July 30, 2002 stack test will be used to calculate a weighted average overall control efficiency for VOC emissions from the SRU.

The B squared process emissions are abated by a thermal incinerator and scrubber which has demonstrated 99.99% destruction efficiency for Carbon Disulfide emissions. Supporting operation logs of batches processed thru B squared along with the emission rates established from the Dec 16, 2002 stack test will be used to calculate destruction efficiency of VOC's based on a weighted average. Monitoring of boiler oxygen content, scrubber PH, scrubber pressure drop as specified elsewhere in this permit will insure that the B squared process is operating the same as during the stack test. This operation is a batch reaction occurring in a tank with all emissions vented to control equipment. Capture can be assumed to be 100%.

The low concentration emission sources vented to the E.P. NCS01 are unabated and were stack tested at the end of July 2002 for capture and Carbon Disulfide emissions, the predominant VOC. Smoke tubes were used to demonstrate that the building is under negative draft and therefore 100% capture of emissions can be assumed. All sources not controlled were sampled and emit less than 3 pounds per hour and are exempt from RACT under 6 NYCRR part 212.10. Any changes to production or fan/ventilation system will require evaluation of RACT at these emission points.

Parameter Monitored: VOC

Lower Permit Limit: 81 percent

Reference Test Method: EPA meth 18 or simil

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED



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**VALUE AT ANY TIME**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

**Condition 2-7: Compliance Certification**

**Effective between the dates of 06/03/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.6**

**Replaces Condition(s) 49**

**Item 2-7.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01

**Item 2-7.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This condition establishes an equivalent opacity limit as allowed under 6 NYCRR part 212.6(b). The facility has performed stack testing at this source for particulates to demonstrate compliance with the requirements in the "Mod 0" permit under conditions 46, 6NYCRR Part 21.4(c), and 48, 6 NYCRR Part 212.4(a) which are now expired. The test was performed on December 21, 2001. Total particulate measured was 0.003 grains/dscf and 0.337 lbs/hr, condensable particulate concentration measured was 0.00064 and 0.337 lb/hr, and filterable particulate measured was 0.0025 grs/dscf and 1.32 lbs/hr which is in compliance with the 6 NYCRR Part 212. The opacity observed during the stack test averaged as high as 45% and is attributed to sulfuric acid mist, which is emitted at a rate of 2.4 lbs/hr from the B-Squared process. B-Squared emissions of carbon disulfide are controlled with a thermal incinerator and scrubber. B-Squared will be replaced with new technology equipment permitted under "Mod 1" in the near future at which time the equivalent opacity in this condition will expire and the limit for opacity will revert back to the regulation limit of 20% based on a 6 minute average.



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1) Observe the stack once per week for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the equivalent opacity standard of 45% is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**\*\* NOTE \*\*** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY  
Upper Permit Limit: 45 percent  
Reference Test Method: EPA method 9  
Monitoring Frequency: WEEKLY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

**Condition 2-8: Compliance Certification**

**Effective between the dates of 06/03/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.9**

**Replaces Condition(s) 50**

**Item 2-8.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 2-8.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

This office must be notified prior to planned maintenance of the Solvent Recovery Unit, which results in operation without control. Bypass due to carbon change of the preadsorber is expected to occur once every four to five months. Bypass due to carbon change of the primary adsorbers is expected to occur once every 8 to 9 months, which will coincide with one of the preadsorber changes. During planned SRU bypass, the facility production rate will be reduced to a level which produces 140 pounds per hour or less of CS<sub>2</sub> emissions out the NCS01 stack. This emission rate has been modeled and the ambient ground level concentration is below the Airguide 1 short-term guidance concentration (SGC) and the odor threshold for carbon disulfide.

Manufacturer Name/Model Number: Servomex Xendos 2500 NDIR

Upper Permit Limit: 140 pounds per hour

Reference Test Method: EPA method 1-4&18

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 7/30/2003.

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**Condition 2-10: Compliance Certification**

**Effective between the dates of 06/03/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 257-10**

**Replaces Condition(s) 52**

**Item 2-10.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01

**Item 2-10.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

An hourly emissions rate of 8.4 lbs/hour of Hydrogen Sulfide (H<sub>2</sub>S) was modeled to show compliance with the ambient air quality standard of 0.01ppm in 257-10. Facility will not exceed this emissions rate during normal operation. Compliance is based on stack tests performed on Nov 4, 1999. The significant sources of H<sub>2</sub>S emissions at this emission point are the B2 process and the sources venting to the SRU. The B2 process emissions are controlled by a thermal oxidizer and scrubber. Emissions of H<sub>2</sub>S from the B2 process were measured at a rate of .144 pounds per hour. H<sub>2</sub>S emissions from the main stack ,NCS01, during Jan of 2003 were less than .01 pounds per hour. Compliance is determined by maintaining the control equipment for B2 as specified elsewhere in this permit. Once B-Squared is replaced with the new technology equipment proposed under Mod 1 , a stack test will be performed to demonstrate compliance with this limit and new monitoring conditions established if necessary. H<sub>2</sub>S from sources venting to the SRU are removed in the preadsorber. Maintenance of this preadsorber and periodic monitoring of breakthrough will insure compliance with the H<sub>2</sub>S limits.

Parameter Monitored: HYDROGEN SULFIDE

Upper Permit Limit: 8.4 pounds per hour

Reference Test Method: epa method 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



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**DESCRIPTION**

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

**Condition 54: Compliance Certification**

**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.4**

**Item 54.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01

Process: NCS Emission Source: 000C1

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 54.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The pressure drop across the baghouse will be recorded once per operating day. The baghouse pressure drop will be maintained at or below 6.0 inches of water.

Parameter Monitored: PRESSURE

Upper Permit Limit: 6.0 inches of water

Monitoring Frequency: DAILY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

**Condition 55: Compliance Certification**

**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.4**



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**Item 55.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01  
Process: NCS Emission Source: 000C2

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

**Item 55.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The pressure drop across the baghouse will be recorded  
once per operating day. The baghouse pressure drop will be  
maintained at or below 6.0 inches of water.

Parameter Monitored: PRESSURE

Upper Permit Limit: 6.0 inches of water

Monitoring Frequency: DAILY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

**Condition 2-12: Compliance Certification**

**Effective between the dates of 06/03/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.11(b)(3)**

**Replaces Condition(s) 57**

**Item 2-12.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01  
Process: NCS Emission Source: 0NSRU

**Item 2-12.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The referenced rule requires that the outlet

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concentration of Volatile Organic Compounds (VOC) be monitored from fixed bed carbon adsorption units. This emission unit is also monitored to determine compliance with 6 NYCRR part 212.10 "RACT" by demonstrating an overall VOC emission reduction of 81% and to determine compliance with the pound/hour and ton/year limits under part 231-2. To do this 3M operates and maintains a Carbon Disulfide (CS<sub>2</sub>) Continuous Emission Rate Monitoring System which consists of infrared monitors for CS<sub>2</sub> at the inlet of the carbon adsorption system, the outlet of the carbon adsorption system and the main stack with flowmeters at the SRU outlet and main stack. This emission point is also equipped with Sulfur Dioxide (SO<sub>2</sub>) and Carbonyl Sulfide (COS) CEM's at the outlet of the NCS01 stack. This condition outlines the operation and oversight of all the CEM systems mentioned to determine compliance.

1. The continuous emission monitors must be operated at all times when the associated process equipment is operating except during reasonable periods of monitor downtime due to the following causes which are not considered deviations:
  - a. Quality assurance, including RATA's and CGA's, daily zero and span drift checks and calibration checks;
  - b. Routine maintenance activities;
  - c. Sudden monitor breakdowns due to, among other things, power failures;
  - d. Damage to the monitoring system due to acts of God such as lightning strikes, tornadoes or floods, which render the monitor inoperative.
2. Submit a revised Monitoring plan and Quality Assurance plan for the CS<sub>2</sub>, and COS SO<sub>2</sub> CEM'S within 30 days of the issuance of this permit. Each monitor must be operated according to a quality assurance program approved by the Department. Both plans must be kept current with update when significant changes to the continuous emissions monitoring system or new data warrants it. All plans and reports must be submitted to both the regional office and central office at the following addresses: NYSDEC region 9-division of Air Resources, 270 Michigan Ave. Buffalo, N.Y. 14203. NYSDEC Albany Central Office, 625 Broadway, Albany N.Y. 12233-3254. NYSDEC's Air Guide 34 contains an appropriate outline for an acceptable Monitoring plan and Quality Assurance plan.
3. Perform an initial certification test to evaluate the system and ensure that it will produce accurate data.

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Prior to conducting the certification tests, 3M must submit a protocol to DEC region 9 office and a copy to the DEC central office for approval. DEC must be given the opportunity to witness the initial Relative Accuracy Test Audit (RATA) and each annual RATA. DEC requires 60 days notice prior to initial RATA tests and 30 days notice prior to annual RATA tests.

4. A test report for RATA's must be submitted to the DEC region 9 office and to the Bureau of Compliance Monitoring and Enforcement, Albany Central Office within 60 days after the completion of testing.

5. 3M must keep a file of all measurements, including continuous emissions monitoring system, monitoring device, and performance testing measurements. Also to be maintained are all continuous emissions monitoring system or monitoring device calibration checks, and adjustments and maintenance performed on these systems. The file must be maintained for at least 5 years from the date of such measurements, maintenance, reports, and records and made available for inspection to NYSDEC personnel.

6. The facility shall submit a written report to the Region 9 office and to the Bureau of Compliance Monitoring and Enforcement, Albany Central Office on a calendar year quarter. All quarterly reports shall be post marked by the 30th day following the end of each calendar quarter and shall include:

a. A summary of all emission limitations

b. A summary of CEM operations, including down time and out-of-control periods. The time monitors are taken off line for daily zero and span checks need not be reported. The data lost because of daily drift checks (two fifteen minute periods per day) is not considered as down time.

c. The Quality Assurance program requires daily, quarterly and annual audits. The daily drift checks shall be done using a zero level (0 to 20% of span) and high level (80 to 100% of span) gas. The CS<sub>2</sub>, COS and SO<sub>2</sub> gases must be certified NIST traceable gases to + or- 2%. If the monitor has dual ranges, and the low range has been exceeded for one hour or longer since the previous test, both ranges must be tested. The signal calibration check for flow meters must be done once per day. A RATA shall be done annually. A Cylinder Gas Audit (CGA) shall be done quarterly. The SO<sub>2</sub> gas must be protocol 1 (NIST traceable). The CS<sub>2</sub> and COS gases must be certified NIST traceable to + or- 2%. A RATA can be used in lieu of a CGA for one of the quarters. If an audit shows unacceptable

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results, corrective action shall be taken and the audit repeated. The results of both audits shall be submitted. A summary of the quarterly audit reports shall include copies of the gas certifications.

d. Descriptions of any significant changes affecting emissions in the process, control equipment or CEM emissions monitoring system.

e. Each incident of excess emissions shall be reported, including those times that are exempt. The date, pollutant, the start and end time of each incident and the reason for the incident should be included.

f. A summary sheet for the total number of times the facility was in violation of the permitted emission limits. The total time during the quarter for which the CEM system was not recording data including: (i) acceptable monitor downtime (defined above, excluding daily zero and span checks, which need not be reported); (ii) monitor downtime due to circumstances other than those indicated above. A valid hour is one in which a minimum of one data point is measured and recorded each 15-minute period. During daily drift checks, 75% of the data points per hour will be accepted for no more than two consecutive hourly averages.

7. During periods of mechanical breakdown of a mechanical or electronic recorder, the permittee may show compliance by manually recording the temperature or other parameters once per hour. This is not applicable to CEM's. Data, method of acquisition, and frequency is still subject to department approval as outlined in the NCS01 monitoring plan.

Manufacturer Name/Model Number: Servomex Xendos 2500 NDIR

Parameter Monitored: VOC

Lower Permit Limit: 81 percent

Reference Test Method: 40 CFR appd A+B

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

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**Condition 58: Compliance Certification**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.11(b)(5)**

**Item 58.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01  
Process: NCS Emission Source: BOIL4

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 58.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The percent oxygen in the boiler #4 exhaust gas will be monitored and recorded on a chart. Oxygen content is an indicator of good combustion in this boiler and was monitored during the stack test of Nov 1999 to establish the 6% oxygen in the exhaust gas lower limit. The boiler burns Carbon disulfide emissions sparged off the liquor in the B squared tank.

Parameter Monitored: OXYGEN CONTENT  
Lower Permit Limit: 6 percent  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 30 MINUTE AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2002.  
Subsequent reports are due every 6 calendar month(s).

**Condition 59: Compliance Certification**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.11(b)(5)**

**Item 59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01



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Process: NCS

Emission Source: BOIL4

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 59.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The exhaust gas temperature will be monitored on boiler#4. Recording charts will be maintained for this parameter. Exhaust gas temperature is an indicator of good combustion and is being monitored in lieu of more frequent compliance testing. The temperature of 500 degrees will be maintained during the burn at all times.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

**Condition 60: Compliance Certification**

**Effective between the dates of 06/04/2002 and 06/04/2007**

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

**Item 60.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01

Process: NCS Emission Source: SCRUB

**Item 60.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A gage to monitor pressure drop across the scrubber will be maintained and calibrated according to manufacturers



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specifications or 3M defined specifications. Pressure drop readings and condition of equipment will be checked once per operating day and observations recorded. Scrubber Pressure drop monitoring insures control efficiencies are equivalent to that demonstrated during the stack test demonstration of compliance. The wide range of differential pressure is due to the lag time between batches and instrument response to spikes at the beginning of a cycle. The lag time is a few seconds. Differential pressure should be above 10 during after initial start of batch processing.

Parameter Monitored: PRESSURE CHANGE  
Lower Permit Limit: 3 inches of water  
Upper Permit Limit: 12 inches of water  
Monitoring Frequency: DAILY  
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2002.  
Subsequent reports are due every 6 calendar month(s).

**Condition 61: Compliance Certification**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

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

**Item 61.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01  
Process: NCS Emission Source: SCRUB

**Item 61.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The scrubber liquid flow rate to the scrubber will be monitored and recorded once per operating day to insure proper operation.

Manufacturer Name/Model Number: TBD  
Parameter Monitored: VOLUMETRIC FLOW RATE  
Lower Permit Limit: 25 gallons per minute



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Upper Permit Limit: 45 gallons per minute  
Monitoring Frequency: DAILY  
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED  
RANGE AT ANY TIME  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2002.  
Subsequent reports are due every 6 calendar month(s).

**Condition 62: Compliance Certification**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

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

**Item 62.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01  
Process: NCS Emission Source: SCRUB

**Item 62.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING  
Monitoring Description:  
The PH of the scrubber liquid is monitored continuously  
and data recorded once per operating day. This is to  
insure that the scrubber is operating in a fashion  
equivalent to the performance test conducted on Nov. 1999.  
The data can be presented as half hour averages.

Manufacturer Name/Model Number: TBD  
Parameter Monitored: ACIDITY/ALKALINITY  
Lower Permit Limit: 6.4 pH (STANDARD) units  
Upper Permit Limit: 9.5 pH (STANDARD) units  
Reference Test Method: epa  
Monitoring Frequency: DAILY  
Averaging Method: 30 MINUTE AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2002.  
Subsequent reports are due every 6 calendar month(s).

**Condition 63: Compliance Certification**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

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

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**Item 63.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01    Emission Point: NCS01  
Process: NCS                      Emission Source: SCRUB

Regulated Contaminant(s):  
CAS No: 007446-09-5    SULFUR DIOXIDE

**Item 63.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The referenced rule requires 96% control for sulfur dioxide for emission rate potentials between 500 and 1500lbs/hr. The production increase permitted under the construction permit issued 1/10/2000 allows for doubling the batch output of the B2 process. (one per hour to 2 per hour, ERP=1100 lbs/hr) A performance test was completed 11/99 to demonstrate compliance with 212.9, table 2 and to establish appropriate equipment operating ranges and conditions. The scrubber and boiler #1 will be monitored as described elsewhere in this permit to demonstrate compliance between stack tests. A stack test will be performed on request.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 96 percent

Reference Test Method: epa methods

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

**Condition 64: Compliance Certification**

**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 226.3(a)**

**Item 64.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-PTSCL

**Item 64.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Except where otherwise permitted by the commissioner, the following devices are required by a source owner conducting solvent metal cold cleaning degreasing:

(1) A cover shall be provided which can be operated easily.

(2) The drainage facility shall be internal (under cover), if practical.

(3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.7, or a water cover where the solvent is insoluble in and heavier than water, where the solvent being used has a vapor pressure greater than 33mm Hg at 38° C (100° F) or where the solvent is heated above 50° C (120°F).

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 7/30/2002.

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

**Condition 65: Compliance Certification**

**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 226.4(a)**

**Item 65.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PTSCL

**Item 65.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



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**Monitoring Description:**

except where otherwise permitted by the commissioner, the following operating practices are required by a source owner conducting solvent metal cleaning

decreasing:

-Clean parts shall be drained at least 15 seconds or until dripping ceases.

-operating procedures must be posted next to equipment.

-monitoring by supervisors is sufficient to demonstrate compliance with this requirement, no additional records are necessary.

**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 7/30/2002.

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

**Condition 4-7: Compliance Certification**

**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.11**

**Item 4-7.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SEPAR

**Item 4-7.2:**

Compliance Certification shall include the following monitoring:

**Monitoring Type: INTERMITTENT EMISSION TESTING**

**Monitoring Description:**

Emission point SEPAR will be stack tested to determine control efficiency for emissions of Total Volatile Organic Compounds (VOC), Acrolein, Acetaldehyde and Carbon Disulfide. VOC's are counted towards the facility cap, carbon Disulfide emissions are limited to 7.8 pounds per hour elsewhere in this permit, Acrolein and Acetaldehyde emissions must be below the short and long term guidance concentrations established in Air Guide 1 as determined by modeling at the property line. Air Quality modeling results submitted with the application evaluated allowable emissions of Acrolein and Acetaldehyde when controlled by the Thermal Oxidizer venting out emission point SEPAR and

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when in by pass mode venting out emission point NCS01. At the estimated Potential to Emit and a 98% destruction Efficiency rating of the Thermal Oxidizer emissions of Acrolein and Acetaldehyde will meet the levels established in Air Guide 1. The 98% control efficiency of the oxidizer also meets the requirements for Reasonable Available Control Technology (RACT) for VOC's per 6 NYCRR part 212.10.

A stack test on the outlet of emission point SEPAR must also be performed to determine emissions of Sulfur Dioxide, Sulfuric Acid mist and Hydrogen Sulfide in order to establish emission rates to insure compliance with the facility caps for these contaminants listed elsewhere in the permit . The stack test will also be used to establish the minimum operating temperature of the thermal oxidizer. A stack test protocol must be submitted for approval 30 days prior to the test. A stack test must be performed within 180 days of start up and Department representatives allowed to witness the test. An acceptable stack test report must be submitted within 45 days of the stack test.

During events defined as start up, shutdown , or malfunction (SSM) in the facility's SSM plan, or in other unexpected emergency situations where it is safer and/or more environmentally beneficial to continue to operate WAO while by passing the RTO rather than shutting down the WAO; the facility may bypass the RTO and vent the emissions out the existing main stack (NCS01). Per 6NYCRR Part 201-1.4, violations of any applicable emission standards during the above described scenarios may be excused if such violations are unavoidable. Notification, record keeping and reporting requirements must be in accordance with 6 NYCRR part 201-1.4. At a minimum PH of liquor into WAO and Oxygen content of the air stream leaving the WAO unit will be used to determine appropriate operation of the equipment as listed elsewhere in the permit during bypass mode.

Parameter Monitored: VOC's

Lower Permit Limit: 98 percent reduction by weight  
(corrected to 7% O<sub>2</sub>, dry basis)

Reference Test Method: approved EPA methods

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



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Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 4-8: Compliance Certification**

**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.5(d)**

**Item 4-8.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SEPAR Emission Point: SEPAR

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 4-8.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Sulfur Dioxide emissions at the facility are limited to 71.26 tpy under 40 CFR part 52.21 subpart A as detailed elsewhere in this permit. Emissions of Sulfur Dioxide (SO<sub>2</sub>) from the Thermal Oxidizer (TO) will be continuously monitored and counted towards this CAP. Although the TO will create SO<sub>2</sub> while destroying Carbon Disulfide (CS<sub>2</sub>) as well as other Volatile Organic Compounds and Hazardous air pollutants, it is the Departments opinion that the benefits greatly outweigh any other option and therefore control of SO<sub>2</sub> is not required. The Continuous Emission Monitoring specifications (manufacture, model, sample location etc.) will be submitted for approval prior to operation of the TO. A Quality Assurance/Quality Control manual must be submitted by December 31, 2005. Installation and Certification of the CEM must be completed by March 1, 2006.

The facility may request for an alternative method to monitor and quantify SO<sub>2</sub> emissions rather than monitoring SO<sub>2</sub> emissions with a CEMS. The facility shall obtain formal approval from the NYSDEC prior to implementing an alternative method to monitor and quantify SO<sub>2</sub> emissions.

Reports summarizing WAO operation, CEM down time and CEM QC/QA are required to be submitted to this office



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quarterly.

The upper limit amount listed below of 13.14 pounds per hour is the estimated potential to emit of this source during normal steady state conditions.

Manufacturer Name/Model Number: to be determined

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 13.14 pounds per hour

Reference Test Method: 40 cfr part 60

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2005.

Subsequent reports are due every 3 calendar month(s).

**Condition 1-10: Compliance Certification**

**Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)**

**Item 1-10.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SEPAR Emission Point: SEPAR

**Item 1-10.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This process technology converts the contaminants in the salt reclamation process to sulfate and carbon dioxide. Conversion efficiency is a function of PH and mother liquor oxygen content. Conversion efficiency of 99% for carbon disulfide (CS<sub>2</sub>) has been proven in pilot tests. By maintaining PH and oxygen within proposed operating limits the emission rate of 7.8 pounds per hour will not be exceeded. Following is the proposed lower limit for % oxygen in the oxidized liquor which was established through the use of pilot test data and operational knowledge. This will be verified and adjusted as required following the stack test to a level based on the stack test and approved by the Department.



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Parameter Monitored: OXYGEN CONTENT  
Lower Permit Limit: 7 percent  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2003.  
Subsequent reports are due every 12 calendar month(s).

**Condition 1-11: Compliance Certification**

**Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)**

**Item 1-11.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SEPAR Emission Point: SEPAR

Regulated Contaminant(s):

CAS No: 000075-15-0 CARBON DISULFIDE

**Item 1-11.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

3M currently operates a salt reclamation process called B squared. In B squared 60 % of the liquor used to wash the salt from sponges is sparged or aerated to remove contaminants such as Carbon Disulfide and other Sulfur bearing compounds and then returned back to the sponge process. The solvent laden air is then destroyed in a thermal incinerator and resulting sulfur emissions scrubbed in a caustic scrubber. Destruction efficiencies for Volatile Organic Compounds of 99% are achieved with this system. This modification is for the replacement of B squared and related control equipment with a process technology system that will treat 100% of the liquor and convert contaminants to sulfate and carbon dioxide. The pilot tests conducted to date demonstrate 99% conversion of Carbon Disulfide in liquor to Sodium Sulfate salt, carbon dioxide and water.

The process technology (U-SEPAR) will be considered Reasonable Available Control Technology based on the fact that more than 81% of the solvent in liquor is oxidized to a salt vs destroyed by incineration. Compliance will be



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verified by monitoring mother liquor PH and oxygen content. Specific ranges developed during pilot tests are specified elsewhere in this permit.

The resulting Carbon Disulfide emissions from the new process will be limited to 7.8 pounds per hour, at emission point SEPAR, in order to maintain current air quality. The facility has a "cap" for Carbon Disulfide emissions at emission point NCS01 of 337.9 tons per year. This limit was established under 6NYCRR part 231-2.2 for the addition of the continuous sponge line, permit issued 1/10/2000. Emission point NCS01 vented emissions from the solvent recovery unit, the B squared process and several uncontrolled sources. The emissions from the process technology (U-SEPAR) will be counted against this "cap" as was done with B squared and therefore New Source Review is not an issue.

A stack test will be performed within 180 days of start up to demonstrate compliance with the pound/ hour limit and to verify the surrogate PH and Oxygen content monitoring parameters. A stack test protocol must be submitted for approval 45 days prior to the proposed test date. At a minimum sampling For Total Volatile Organic Compounds (VOC),Carbon Disulfide, and Hydrogen Sulfide will be required. {The 337.9 tpy cap on emission point NCS01 was based on 1997 and 1998 VOC average emission rate of 358.6 tpy plus 39.9 tpy (deminimus)=398.5tpy multiplied by the 94.15% CS2 factor to get 337.9 tpy CS2 allowable. (CS2 being the surrogate contaminant monitored by CEM.) Total VOC at emission point SEPAR will be measured to determine the contribution towards the 398.5 tpy VOC number used in calculating the CS2 limit,(337.9tpy)} Emissions of H2S is also capped at Emission Unit NCS01 and emissions from U-SEPAR must be counted towards this limit of 33.12 tpy. Sampling for H2S will verify the contribution from U-SEPAR and will establish an emission factor.

A stack test report of results is due within 45 days after the test date.

Upper Permit Limit: 7.8 pounds per hour

Reference Test Method: epa method 18

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)



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Reports due 30 days after the reporting period.  
The initial report is due 1/30/2003.  
Subsequent reports are due every 12 calendar month(s).

**Condition 1-12: Compliance Certification**

**Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)**

**Item 1-12.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SEPAR Emission Point: SEPAR

**Item 1-12.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The process technology converts the contaminants in the salt reclamation process to sulfate and carbon dioxide. Conversion efficiency is a function of PH and mother liquor oxygen content. Conversion efficiency of 99% for carbon disulfide (CS<sub>2</sub>) has been proven in pilot tests. By maintaining PH and oxygen within proposed operating limits the emission rate of 7.8 pounds per hour will not be exceeded. Following is the proposed lower limit for PH established through the use of pilot test data and operational knowledge.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 2.3 pH (STANDARD) units

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

Subsequent reports are due every 12 calendar month(s).

**Condition 4-9: Compliance Certification**

**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 212.11(b)(1)**

**Item 4-9.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-SEPAR Emission Point: SEPAR

**Item 4-9.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The Thermal Oxidizer installed to control Volatile Organic Compound emissions on the Wet Air Oxidation process has a design specification target for the combustion chamber operating temperature of 1600 degrees F. Outlet temperature will be continuously monitored and recorded. The minimum combustion chamber operating temperature will be established during the performance test required elsewhere in this permit.

A startup, shutdown, and malfunction plan for Wet Air oxidation, including the Thermal Oxidizer shall be submitted for approval by March 1, 2006.

Process Material: VOC's

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1600 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

**Condition 66: Compliance Certification**

**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 229.3(e)**

**Item 66.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: CS20A

Process: 266 Emission Source: CS200

Regulated Contaminant(s):

CAS No: 000075-15-0 CARBON DISULFIDE

**Item 66.2:**



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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Carbon disulfide is stored in this 30,000 gallon tank and emissions minimized with the use of a water blanket in the tank and in the dyke area. CS<sub>2</sub> is heavier than water and immiscible in water. This is equivalent and possibly more effective than an internal floating roof. (Also note that this is a horizontal tank and a floating roof is not possible.) The water blanket must be checked daily and observations recorded.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

**Condition 67: Compliance Certification**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 227.2(b)(1)**

**Item 67.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-THERM

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 67.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emission limit for a stationary combustion installation firing oil. The owner or operator shall complete the following once per term of this permit:

- 1) submit, to the Department, an acceptable protocol for the testing of particulate emission limit cited in this condition,
- 2) perform a stack test, based upon the approved test protocol, to determine compliance with the particulate



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emission limit cited in this condition, and

3) all records shall be maintained at the facility for a minimum of five years.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

**Condition 68: Compliance Certification**

**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 225-1.2**

**Item 68.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-THERM Emission Point: E0000

Process: 254

**Item 68.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The federally enforceable (State Implementation Plan version of 225) limits sulfur in fuel oils to a 2.0% max and a 1.7% avg. This is less restrictive than the current version of 225-1.2 (D) which is 1.5% sulfur in oil.

Compliance with the 1.5% sulfur in oil will also demonstrate compliance with the "SIP" version of 225 at 2.0%.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: OTHER LIQUID FUELS

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 2.0 percent

Reference Test Method: D1552-83

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL



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**CHANGE**

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

**Condition 69: Compliance Certification**

**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable Federal Requirement: 6NYCRR 225-1.2**

**Item 69.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-THERM Emission Point: E0000

Process: 254

**Item 69.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

This Facility currently has the capability to burn No. 2, No. 6 oils and natural gas. Natural gas is the primary fuel. This condition limits the sulfur in both No. 2 and No. 6 oil to 1.5% sulfur by weight, purchased, as specified in 6 NYCRR part 225-1.2(d)- table 2. Both No. 2 oil and No. 6 oil, in the area that this plant is located, have the same sulfur in fuel limit. Note: Table 2 is not approved in the NYS State Implementation Plan. Conditions citing 6 NYCRR part 225-1.2(c), table 1, is also cited in this permit as a federally enforceable permit condition. The State will enforce table 2, 1.5% sulfur in oil.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: OTHER LIQUID FUELS

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Reference Test Method: astm D1552-83

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.  
The initial report is due 7/30/2002.  
Subsequent reports are due every 6 calendar month(s).



**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: 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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 1-13: Contaminant List**

**Effective between the dates of 01/27/2003 and 06/04/2007**

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

**Item 1-13.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this



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permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000075-15-0

Name: CARBON DISULFIDE

CAS No: 007783-06-4

Name: HYDROGEN SULFIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 007664-93-9

Name: SULFURIC ACID

CAS No: 0NY998-00-0

Name: VOC

**Condition 70: Unavoidable noncompliance and violations**  
**Effective between the dates of 06/04/2002 and 06/04/2007**

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

Item 70.1:

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

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

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



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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 superceded 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 4-10: Facility Permissible Emissions**

**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 4-10.1:**

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: 000075-15-0 (From Mod 4) PTE: 743,285 pounds per year  
Name: CARBON DISULFIDE

CAS No: 007446-09-5 (From Mod 4) PTE: 142,520 pounds per year  
Name: SULFUR DIOXIDE

CAS No: 007664-93-9 (From Mod 4) PTE: 32,000 pounds per year  
Name: SULFURIC ACID

CAS No: 007783-06-4 (From Mod 4) PTE: 66,240 pounds per year  
Name: HYDROGEN SULFIDE

**Condition 4-11: Capping Monitoring Condition**

**Effective between the dates of 09/06/2005 and 06/04/2007**

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**Applicable State Requirement: 6NYCRR 201-7**

**Item 4-11.1:**

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

40CFR 52-A.21

**Item 4-11.2:**

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

**Item 4-11.3:**

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 4-11.4:**

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 4-11.5:**

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 4-11.6:**

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

Emission Unit: U-NCS01

Emission Unit: U-SEPAR

Regulated Contaminant(s):

CAS No: 007783-06-4 HYDROGEN SULFIDE

**Item 4-11.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes



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

Monitoring Description:

This condition will cap the increased hydrogen sulfide (H<sub>2</sub>S) emissions at the facility below the PSD de minimis of 10 tpy. H<sub>2</sub>S emissions during 1997 and 1998=23.33 tpy+9.9 tpy cap=33.12 tpy permissible.

3M has made an earnest effort to operate an H<sub>2</sub>S monitor as originally required in the Title V permit, mod 0 version, condition # 53 under 40 CFR 52.21. Difficulties with other sulfur compound (i.e. CS<sub>2</sub>) cause analyzer interference have made it technologically infeasible to obtain accurate emission data. The CEM for H<sub>2</sub>S is not specifically required by regulation and therefore can be removed and compliance demonstrated by other means. The emissions have been tested on a number of occasions and an emission factor established from these tests will be used to determine compliance with the 33.12 tpy cap based on a rolling 12 month average. H<sub>2</sub>S emissions from the man stack, NCS01, were measured at 0.01 pounds per hour during sampling in January of 2003. H<sub>2</sub>S from sources venting to the SRU are removed in the preadsorber using a potassium iodide impregnated carbon. Maintenance of this preadsorber and monitoring of breakthrough will be used to insure compliance with the H<sub>2</sub>S limits.

The significant sources of H<sub>2</sub>S emissions are from Emission unit SEPAR, NCS01 and other sources venting to the SRU. The WAO process emissions are controlled by a thermal oxidizer an emission factor will be established during the compliance test required elsewhere in the permit.

Parameter Monitored: HYDROGEN SULFIDE

Upper Permit Limit: 33.12 tons per year

Reference Test Method: EPA method 15 or Eq

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

**Condition 4-12: Capping Monitoring Condition**



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**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 4-12.1:**

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

40CFR 52-A.21

**Item 4-12.2:**

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

**Item 4-12.3:**

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 4-12.4:**

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 4-12.5:**

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 4-12.6:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-NCS01

Emission Unit: U-SEPAR

Regulated Contaminant(s):

CAS No: 000075-15-0 CARBON DISULFIDE

**Item 4-12.7:**

Compliance Demonstration shall include the following monitoring:



**New York State Department of Environmental Conservation**

**Permit ID: 9-1464-00164/00117**

**Facility DEC ID: 9146400164**

Capping: Yes

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

This condition will limit the increase of emissions below the applicable de minimis of 40 tpy in 6 NYCRR part 231-2 and 40 CFR 52.24, PSD, for VOC's at an existing major facility as established in the state facility permit issued for construction and operation dated 1/10/2000. Emissions of CS<sub>2</sub> will be controlled at a higher efficiency (81% overall control as required by 6 NYCRR 212.10 instead of the 65% allowed under a variance with previous permits) with the installation of the new solvent recovery unit and monitored with CEM's at the inlet and outlet of the control unit and at the stack for all emissions ducted to emission Unit NCS01. Also the Wet Air Oxidation process will be stack tested to establish appropriate emission rates and control equipment monitoring parameters all of which are detailed in other conditions in this permit. CS<sub>2</sub> is the primary VOC (>94.15%), the remainder is carbonyl sulfide (COS). CS<sub>2</sub> and COS are continuously monitored at emission source NCS01. The majority of the facility emissions exit this stack.

The cap and compliance monitoring will be based on CS<sub>2</sub> emissions at emission unit NCS01, SEPAR and other sources venting to the SRU. The annual limit of 337.9 tpy of CS<sub>2</sub> emissions based on a 12 month rolling average will not subject this modification to the applicability of new source review under part 231-2 and the requirements of 40 CFR 52.24 .

Manufacturer Name/Model Number: Servomex Xendos 2500 NDIR

Upper Permit Limit: 337.9 tons per year

Reference Test Method: EPA method 15 or eq.

Monitoring Frequency: CONTINUOUS

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

**Condition 4-13: Capping Monitoring Condition**

**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 4-13.1:**



**New York State Department of Environmental Conservation**

**Permit ID: 9-1464-00164/00117**

**Facility DEC ID: 9146400164**

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

40CFR 52-A.21

**Item 4-13.2:**

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

**Item 4-13.3:**

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 4-13.4:**

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 4-13.5:**

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 4-13.6:**

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

Emission Unit: U-NCS01

Emission Unit: U-SBOIL

Emission Unit: U-SEPAR

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 4-13.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

**New York State Department of Environmental Conservation**

**Permit ID: 9-1464-00164/00117**

**Facility DEC ID: 9146400164**



**Monitoring Description:**

Emission Units NCS01, SEPAR, and BOILS are the only sources of SO<sub>2</sub> emissions and will be limited to 71.26 tpy to keep the net emission increase for this modification below the de minimis level of 40 tpy in the specified regulation. (1997, 1998 average SO<sub>2</sub> emission plus a de minimis =  $(41.128 + 21.595) / 2 = 31.36 + 39.9 = 71.26$ .) Records of fuel usage and sulfur content will be kept for boilers associated with emission unit BOILS and SO<sub>2</sub> emissions calculated using the following ap-42 emission factors. SO<sub>2</sub> in natural gas = 0.6 lbs/million cubic feet of gas burned. SO<sub>2</sub> in distillate oil = 142(s) lbs/1000 gallons of oil burned, SO<sub>2</sub> in # 6 oil = 157(s) lbs/1000 gallons of oil burned. Where s = the % by weight sulfur in oil. SO<sub>2</sub> emissions are monitored with a CEM at Emission Unit SEPAR. This SO<sub>2</sub> CEM must also meet the QA/QC requirements for CEM's specified elsewhere in this permit. The total SO<sub>2</sub> emissions from both NCS01, SEPAR and BOILS must be less than 71.26 tons per year based on a 12 month rolling average.

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 71.26 tons per year

Reference Test Method: EPA meth 6, 6c or eq

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

**Condition 4-14: Capping Monitoring Condition**

**Effective between the dates of 09/06/2005 and 06/04/2007**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 4-14.1:**

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

40CFR 52-A.21

**Item 4-14.2:**

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

**New York State Department of Environmental Conservation**

**Permit ID: 9-1464-00164/00117**

**Facility DEC ID: 9146400164**



**Item 4-14.3:**

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 4-14.4:**

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 4-14.5:**

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 4-14.6:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-NCS01

Emission Unit: U-SBOIL

Emission Unit: U-SEPAR

Regulated Contaminant(s):

CAS No: 007664-93-9      SULFURIC ACID

**Item 4-14.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Annual Sulfuric acid mist emissions from emission units NCS01, SEPAR and BOILS will be limited to 16.0 tpy, based on a 12 month rolling average, to keep the net emission increase from this modification below the significance level of 7 tpy. (1997/98 actual emissions avg+6.9,  $9.809+8.382/2 +6.9=16.0$ ). Oil usage and sulfur content records will be kept for emission unit BOILS and emissions based on the following emission factors. 2(s) lbs of



**New York State Department of Environmental Conservation**

**Permit ID: 9-1464-00164/00117**

**Facility DEC ID: 9146400164**

sulfuric acid mist per 1000 gallons of fuel oil burned.

Where  $s$  = weight % sulfur in fuel.

The Wet Air Oxidation process (Emission Unit SEPAR) will be stack tested in the fall of 2005 to establish the appropriate emission factor and equipment operating parameters. Records of batches processed and emission calculations will be maintained to determine compliance with this condition. PH of the oxidized mother liquor and Oxygen content of exhaust gases out of the WAO are monitoring conditions in this permit and will ensure that the equipment is operating consistent with its operation on the day of the stack test. Exceedances must be reported as required elsewhere in this permit.

Parameter Monitored: SULFURIC ACID

Upper Permit Limit: 16.0 tons per year

Reference Test Method: EPA method 8 or eq

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

**Condition 74: Air pollution prohibited**

**Effective between the dates of 06/04/2002 and 06/04/2007**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 74.1:**

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.

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

**Condition 1-14: Compliance Demonstration**

**Effective between the dates of 01/27/2003 and 06/04/2007**

**Applicable State Requirement: 6NYCRR 227-1.2(a)(2)**

**New York State Department of Environmental Conservation**

**Permit ID: 9-1464-00164/00117**

**Facility DEC ID: 9146400164**



**Item 1-14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOILS

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This regulation prohibits any person to allow an emission into the outdoor atmosphere of particulates in excess of 0.10 pounds per million BTU from any oil fired stationary combustion installation. This is stated in the 1980 version of this rule as approved in New York State's Implementation Plan. The current proposed version of this regulation stipulates a limit of 0.20 lbs/mmbtu. Until the later version of 227-1 is approved the lower limit will be enforced. A one time stack test on one of the identical boilers must be performed while firing #2 oil to demonstrate compliance with the 0.01 limit. The test must be performed within 180 days after startup/use of oil. A protocol must be submitted 45 days prior to the proposed test and results submitted within 45 days after the test.

Upper Permit Limit: 0.01 pounds per million Btus

Reference Test Method: epa method 5

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION