



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1464-00164/00117
Mod 0 Effective Date: 11/27/2007 Expiration Date: 11/26/2012
Mod 1 Effective Date: 06/04/2008 Expiration Date: 11/26/2012
Mod 2 Effective Date: 10/21/2008 Expiration Date: 11/26/2012

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

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

Contact: KEITH HELD
3M TONAWANDA
305 SAWYER AVE
TONAWANDA, NY 14150
(716) 871-6281

Description:
This minor TV permit modification is for the construction of two pulp feed systems, identified under process MCO, emission points MC001 and MC002, for viscose production. It will replace the existing pulp system. Emissions are limited to 0.05 grains per dscfm. The source will be stack tested to demonstrate compliance and to establish appropriate operating parameters. Potential particulate emissions are 15 tons per year.

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 compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

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



DEC GENERAL CONDITIONS

**** General Provisions ****

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 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:



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

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

Item 4.1:

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

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

**** Facility Level ****

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



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
3089 - PLASTICS PRODUCTS, NEC

Mod 0 Permit Effective Date: 11/27/2007

Permit Expiration Date: 11/26/2012

Mod 1 Permit Effective Date: 06/04/2008

Permit Expiration Date: 11/26/2012

Mod 2 Permit Effective Date: 10/21/2008

Permit Expiration Date: 11/26/2012



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

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Facility Level

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

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 201-6.5(g): Non Applicable requirements
- 25 6NYCRR 201-7: Facility Permissible Emissions
- *26 6NYCRR 201-7: Capping Monitoring Condition
- *27 6NYCRR 201-7: Capping Monitoring Condition
- *28 6NYCRR 201-7: Capping Monitoring Condition
- *29 6NYCRR 201-7: Capping Monitoring Condition
- 30 6NYCRR 212.6(a): Compliance Certification
- 31 40CFR 63.5505(a), Subpart UUUU: Compliance Certification
- 32 40CFR 63.5505(a), Subpart UUUU: Compliance Certification
- 33 40CFR 63.5515(c), Subpart UUUU: Startup, shutdown and malfunction plan (SSM).



34 40CFR 63.5545(a), Subpart UUUU: Compliance Certification

35 40CFR 63.5580(a), Subpart UUUU: Compliance Certification

Emission Unit Level

36 6NYCRR 201-6: Emission Point Definition By Emission Unit

37 6NYCRR 201-6: Process Definition By Emission Unit

EU=U-BOILS

38 40CFR 60.42c(d), NSPS Subpart Dc: Compliance Certification

EU=U-BOILS,Proc=279

39 40CFR 60.11(e)(1), NSPS Subpart A: Compliance Certification

40 40CFR 60.44c(h), NSPS Subpart Dc: Compliance Certification

EU=U-MAKOT

41 6NYCRR 212.10: Compliance Certification

EU=U-MAKOT,Proc=MCO

2-1 6NYCRR 212.4(c): Compliance Certification

EU=U-NCS01

42 6NYCRR 212.4(c): Compliance Certification

43 40CFR 63.5505(b), Subpart UUUU: Compliance Certification

EU=U-NCS01,Proc=NCS

44 6NYCRR 212.10: Compliance Certification

EU=U-NCS01,Proc=SRU

45 6NYCRR 212.9: Compliance Certification

46 6NYCRR 212.10: Compliance Certification

47 6NYCRR 212.11(b)(3): Compliance Certification

EU=U-NCS01,EP=NCS01,Proc=NCS,ES=00120

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

EU=U-SEPAR

48 6NYCRR 212.9(b): Compliance Certification

49 40CFR 63.5505(b), Subpart UUUU: Compliance Certification

EU=U-SEPAR,EP=SEPAR

50 6NYCRR 212.5(d): Compliance Certification

51 6NYCRR 212.10(c)(4)(i): Compliance Certification

EU=U-TANKS

52 40CFR 63.5505(a), Subpart UUUU: Nitrogen unloading and storage system for carbon disulfide.

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

53 ECL 19-0301: Contaminant List

54 6NYCRR 201-1.4: Unavoidable noncompliance and violations

55 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level



EU=U-BOILS

56 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 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 - 6 NYCRR 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 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 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 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 1: Acceptable Ambient Air Quality
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 200.6

Item 1.1:

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

Condition 2: Fees
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 3.1:

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 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 4.1:

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 5: Compliance Certification

Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

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 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 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 1/30/2008.

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

Condition 6: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 6.1:



The Compliance Certification activity will be performed for the Facility.

Item 6.2:

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 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:

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 1/30/2008.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

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 8: Recordkeeping requirements
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 202-2.5



Item 8.1:

(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.

**Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 11/27/2007 and 11/26/2012**

Applicable Federal Requirement:6NYCRR 215

Item 9.1:

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

**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 10: Maintenance of Equipment
Effective between the dates of 11/27/2007 and 11/26/2012**

Applicable Federal Requirement:6NYCRR 200.7

Item 10.1:

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

**Condition 11: Recycling and Salvage
Effective between the dates of 11/27/2007 and 11/26/2012**

Applicable Federal Requirement:6NYCRR 201-1.7

Item 11.1:

Where practical, any person who owns or operates an air contamination source shall recycle or



salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 201-3.2(a)

Item 13.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 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.

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 201-3.3(a)

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 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.

Condition 15: Standard Requirement - Provide Information

Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 15.1:

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 16: General Condition - Right to Inspect
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 16.1:

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 compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 17.1:

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 18: Off Permit Changes
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 18.1:



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 19: Required Emissions Tests
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 211.3

Item 20.1:

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

Condition 21: Accidental release provisions.
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:40CFR 68

Item 21.1:

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

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:40CFR 82, Subpart F

Item 22.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

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 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 201-6

Item 23.1(From Mod 2):

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

Emission Unit: U-MAKOT

Emission Unit Description:

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): 1-20

Item 23.2(From Mod 0):



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

Emission Unit: U-BOILS

Emission Unit Description:

Two new boilers supply steam for plant use. The boilers are rated for: 60.4 mmBTU/hr when burning No. 2 oil and 63.2 mmBTU/hr when burning natural gas.

Building(s): 1-72

Item 23.3(From Mod 0):

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 23.4(From Mod 1):

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

Emission Unit: U-NCS01

Emission Unit Description:

Sponge making sources associated with viscose production, material weight out and transfer, sponge mixing, sponge cooking, wash tables, continuous salt processing, and reclamation operation that vent to the main stack. It also includes by pass emissions from the mother liquor treatment operation, emission unit USEPAR.

Building(s): NE 1-72

Item 23.5(From Mod 0):

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.

Building(s): 1-72

Item 23.6(From Mod 0):

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, exempt carbon disulfide storage tank, and the water blanket used in carbon disulfide tank secondary containment dike.

Building(s): TANKS

Condition 24: Non Applicable requirements



Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 24.1:

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: CS20D

Reason: This tank is designed to operate in excess of 204.9 kPa and will not have emissions to the atmosphere. The requirements 40 cfr 60, subpart Kb, do not apply per the exemption listed in 40 cfr 60.110b(d)(2).

Condition 25: Facility Permissible Emissions

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 201-7

Item 25.1:

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:

per year	CAS No: 000075-15-0 (From Mod 2)	PTE: 675,800 pounds
	Name: CARBON DISULFIDE	
per year	CAS No: 007446-09-5 (From Mod 2)	PTE: 188,480 pounds
	Name: SULFUR DIOXIDE	
per year	CAS No: 007664-93-9 (From Mod 2)	PTE: 32,000 pounds
	Name: SULFURIC ACID	
per year	CAS No: 007783-06-4 (From Mod 2)	PTE: 66,240 pounds
	Name: HYDROGEN SULFIDE	

Condition 26: Capping Monitoring Condition

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 201-7

Item 26.1:

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 26.2:

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

Item 26.3:

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 26.4:

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 26.5:

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 26.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 26.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Annual facility emissions of SO₂ emissions and will be limited to 94.24 tpy to keep the net emission increase in permit "mod 4" below the de minimis level of 40 tpy in the specified regulation. This is based on 1997 and 1998 average SO₂ emission plus a de minimis = (54.34 + 39.9 = 94.24). Records of fuel usage and sulfur content will be kept for boilers associated with emission unit BOILS and SO₂ emissions calculated using the following ap-42 emission factors. SO₂ in natural gas = 0.6 lbs/million cubic feet of gas burned. SO₂ in distillate oil = 142(s) lbs/1000 gallons of oil burned, SO₂ in # 6 oil = 157(s) lbs/1000 gallons of oil burned. Where s = the % by weight



sulfur in oil.

SO₂ emissions are monitored with a CEM at Emission Unit SEPAR. This SO₂ CEM must also meet the QA/QC requirements for CEM's specified elsewhere in this permit. The total SO₂ emissions from the facility must be less than 94.24 tons per year based on a 12 month rolling average.

The tonnage number changed from mod 4 to this permit because of an error in estimating emissions from boilers.

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 94.24 tons per year

Reference Test Method: EPA appd methods

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 1/30/2008.

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

Condition 27: Capping Monitoring Condition
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 201-7

Item 27.1:

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 27.2:

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

Item 27.3:

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 27.4:

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 27.5:

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 27.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007664-93-9 SULFURIC ACID

Item 27.7:

Compliance Certification 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 the facility are limited to 16.0 tpy, based on a 12 month rolling average, to keep the net emission increase from this modification below the 40 cfr part 52 significance level of 7 tpy. (1997/98 actual emissions plus deminimus= $(9.809+8.382)/2 + 6.9=16.0$). 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 sulfuric acid mist per 1000 gallons of fuel oil burned. Where s= weight % sulfur in fuel.

The emission factor for calculating Wet Air Oxidation process emissions (Emission Unit SEPAR) shall be based on the most recent stack test.

Parameter Monitored: SULFURIC ACID

Upper Permit Limit: 16.0 tons per year

Reference Test Method: epa appd methods

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 1/30/2008.

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

Condition 28: Capping Monitoring Condition

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 201-7

Item 28.1:

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 28.2:

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

Item 28.3:

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 28.4:

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 28.5:

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 28.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 28.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

This condition will cap the increased hydrogen sulfide (H₂S) emissions at the facility below the PSD de minimis of 10 tpy. This review was performed under "mod 4". H₂S 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 H₂S 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. CS₂) cause analyzer interference have made it technologically infeasible to obtain accurate emission data. The CEM for H₂S 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. H₂S emissions from the main stack, NCS01, were measured at 0.01 pounds per hour during sampling in January of 2003. H₂S 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 H₂S limits.

The significant sources of H₂S emissions are from Emission unit SEPAR, NCS01 and other sources venting to the SRU. The Wet Air Oxidation (WAO) process emissions are controlled by a thermal oxidizer. The emission factor for calculating WAO emissions shall be based on the most recent stack test.

Parameter Monitored: HYDROGEN SULFIDE

Upper Permit Limit: 33.12 tons per year

Reference Test Method: EPA appd methods

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 1/30/2008.

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

Condition 29: Capping Monitoring Condition
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 201-7

Item 29.1:

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:

6NYCRR 231-2

Item 29.2:

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

Item 29.3:

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 29.4:

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 29.5:

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 29.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000075-15-0 CARBON DISULFIDE

Item 29.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility has a "cap" for Carbon Disulfide emissions of 337.9 tpy. This limit was established under 6 NYCRR part 231-2 for the addition of the continuous sponge line, permit issued 1/10/2000. Emission point NCS01 vents emissions from the solvent recovery unit, USEPAR and several uncontrolled sources which are counted against this "cap". The 337.9 tpy cap was based on 1997 and 1998 VOC average emission rate of 358.6 tpy plus 39.9 tpy (deminimus) = 398.5 tpy multiplied by the 94.15% CS₂ factor to get 337.9 tpy CS₂ allowable. (CS₂ being the surrogate contaminant monitored by CEM). Emissions from NCS01 are monitored by CEM. The emission factor for calculating wet air oxidation emissions shall be based on the emission factor derived from the latest stack test.

Parameter Monitored: CARBON DISULFIDE

Upper Permit Limit: 337.9 tons per year

Reference Test Method: epa appd methods

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 1/30/2008.

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



Condition 30: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with section 212.6(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

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

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Monitoring Frequency: WEEKLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement: 40CFR 63.5505(a), Subpart UUUU

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Item 31.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- i. reduce total uncontrolled sulfide emissions (reported as carbon disulfide) by at least 75% based on a 6-month rolling average;
- ii. for each vent stream that you control using a control device, route the vent stream through a closed-vent system to the control device; and
- iii. comply with the work practice standard for closed-vent systems which requires annual inspections, repair leaks, and maintain records as specified in 40 cfr 63.140

Requirements for determining compliance:

- 1) Calculate monthly, the average controlled total sulfide emissions reduction;
- (2) Maintain a record of the average operating parameter values used over the month-long compliance demonstration during which the average uncontrolled total sulfide emissions were reduced by at least 75%;
- (3) Prepare a material balance that includes the pertinent data used to determine and the percent reduction of total sulfide emissions; and
- (4) Comply with the initial compliance requirements for closed-vent systems.

Parameter Monitored: CARBON DISULFIDE

Lower Permit Limit: 75 percent reduction

Reference Test Method: Approved EPA methods

Monitoring Frequency: CONTINUOUS

Averaging Method: 180-DAY AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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



Condition 32: Compliance Certification

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement: 40CFR 63.5505(a), Subpart UUUU

Item 32.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-SEPAR

Emission Point: SEPAR

Emission Unit: U-NCS01

Emission Point: NCS01

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

40 cfr 63.5505a, table 1, item 11 describes requirements for a closed vent system containing a bypass line that could divert a vent stream away from a control device, except for equipment needed for safety purposes. The requirement is installation of a flow indicator or secure the bypass line valve with a car seal or lock and key. This facility has been given approval by EPA to operate an alternative monitoring procedure to demonstrate compliance with this section of the rule. This following flow monitoring description is a listed compliance option for by pass flow monitoring in other promulgated NESHAP subparts.

The facility will use flow control position indicators on the existing solvent recovery unit by pass valve and the two by pass valves on the wet air oxidation process regenerative thermal oxidizers. The facility will operate and calibrate the flow control position indicators according to the manufacturers specifications. The flow control position indicator will provide a record indicating whether the exhaust stream is directed to the control device or is diverted from the control device. The time and flow control position will be recorded electronically at least once per hour as well as every time the flow direction is changed.

Department notification of equipment bypass should be in accordance with the requirements detailed under 6 NYCRR part 201-1.4. By pass incidents will be summarized in the semi annual reports.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



Condition 33: Startup, shutdown and malfunction plan (SSM).
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:40CFR 63.5515(c), Subpart UUUU

Item 33.1:

(a) You must be in compliance with the emission limits, operating limits, and work practice standards in this subpart at all times, except during periods of startup, shutdown, and malfunction.

(b) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

(c) You must develop a written startup, shutdown, and malfunction (SSM) plan according to the provisions in §63.6(e)(3).

Condition 34: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:40CFR 63.5545(a), Subpart UUUU

Item 34.1:

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

Emission Unit: U-NCS01
Process: SRU

Emission Unit: U-SEPAR
Process: SEP

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

a) For each CMS required in this section, you must develop and make available for inspection by the permitting authority, upon request, a site-specific monitoring plan that addresses the provisions in paragraphs (a)(1) through (3) of this section.

(1) Installation of the CMS sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);

(2) Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and



reduction system; and

(3) Performance evaluation procedures and acceptance criteria (e.g., calibrations).

(b) In your site-specific monitoring plan, you must also address the provisions in paragraphs (b)(1) through (3) of this section.

(1) Ongoing operation and maintenance procedures in accordance with the general requirements of §§63.8(c)(1), (3), (4)(ii) and 63.5580(c)(6);

(2) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d)(2); and

(3) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §§63.10(c), (e)(1), (e)(2)(i) and 63.5585.

(c) You must conduct a performance evaluation of each CMS in accordance with your site-specific monitoring plan.

(d) You must operate and maintain the CMS in continuous operation according to the site-specific monitoring plan.

(e) For each continuous emissions monitoring system (CEMS), you must meet the requirements in paragraphs (e)(1) through (6) of this section.

(1) Each CEMS must be installed, operated, and maintained according to the applicable performance specification (PS) listed in paragraphs (e)(1)(i) through (iv) of this section:

(2) You must conduct a performance evaluation of each CEMS according to the requirements in §63.8 and according to the applicable performance specification listed in paragraphs (e)(1)(i) through (iv) of this section.

(3) As specified in §63.8(c)(4)(ii), each CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

(4) The CEMS data must be reduced to operating data averages computed using valid data from at least 75 percent of the hours during the averaging period. To have a valid hour of data, you must have four or more data points equally spaced over the 1-hour period (or at least



two data points during an hour when calibration, quality assurance, or maintenance activities are being performed), except as specified in paragraph (e)(5) of this section.

(5) The CEMS data taken during periods in which the control devices are not functioning in controlling emissions, as indicated by periods of no flow for all or a portion of an affected source, must not be considered in the averages.

(6) Determine the daily average of all recorded readings for each operating day during the semiannual reporting period described in Table 8 to this subpart.

(f) For each continuous parameter monitoring system (CPMS), you must meet the requirements in paragraphs (f)(1) through (9) of this section.

(1) Satisfy all requirements of performance specifications for CPMS upon promulgation of such performance specifications.

(2) Satisfy all requirements of quality assurance (QA) procedures for CPMS upon promulgation of such QA procedures.

(3) The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period.

(4) To calculate a valid hourly average, there must be at least four equally spaced values for that hour, excluding data collected during the periods described in paragraph (f)(6) of this section.

(5) Have valid hourly data for at least 75 percent of the hours during the averaging period.

(6) The CPMS data taken during periods in which the control devices are not functioning in controlling emissions, as indicated by periods of no flow for all or a portion of an affected source, must not be considered in the averages.

(7) Calculate a daily average using all of the valid hourly averages for each operating day during the semiannual reporting period.

(8) Record the results of each inspection, calibration, and validation check.

(9) Except for redundant sensors, any device that is used to conduct an initial validation or accuracy audit of a



CPMS must meet the accuracy requirements specified in paragraphs (f)(9)(i) and (ii) of this section.

(i) The device must have an accuracy that is traceable to National Institute of Standards and Technology (NIST) standards.

(ii) The device must be at least three times as accurate as the required accuracy for the CPMS.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 35: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement: 40CFR 63.5580(a), Subpart UUUU

Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

You must submit semiannually a report as specified in 40 cfr 63.5580(b), which addresses all of the items in table 8.

You must keep records as specified in Table 9 that apply to the facility.

Table 10 specifies the general provisions in 40 cfr 63.1 through 63.15 that apply to the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

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

Condition 36: Emission Point Definition By Emission Unit



Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 36.1(From Mod 2):

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

Emission Unit: U-MAKOT

Emission Point: MC001

Height (ft.): 34

Diameter (in.): 24

Building: 1-20

Emission Point: MC002

Height (ft.): 34

Diameter (in.): 24

Building: 1-20

Item 36.2(From Mod 0):

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

NYTMN (km.): 4765.56

NYTME (km.): 180.47

Building: 1-72

Emission Point: BOIL2

Height (ft.): 47

Diameter (in.): 36

NYTMN (km.): 4765.56

NYTME (km.): 180.47

Building: 1-72

Item 36.3(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.): 4765.594

NYTME (km.): 180.354

Building: 1-34

Item 36.4(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

NYTMN (km.): 4765.639

NYTME (km.): 180.413

Building: 1-04

Emission Point: B1000

Height (ft.): 30

Diameter (in.): 24

Building: 1-50

Emission Point: B3000



Height (ft.): 30	Diameter (in.): 24	
NYTMN (km.): 4765.636	NYTME (km.): 180.414	Building: 1-50
Emission Point: BKFWW		
Height (ft.): 28	Diameter (in.): 36	Building: 1-23
Emission Point: BKPBS		
Height (ft.): 28	Diameter (in.): 36	Building: 1-23
Emission Point: FN000		
Height (ft.): 32	Diameter (in.): 24	
NYTMN (km.): 4765.583	NYTME (km.): 180.41	Building: 1-21
Emission Point: FS000		
Height (ft.): 31	Diameter (in.): 20	
NYTMN (km.): 4765.568	NYTME (km.): 180.417	Building: 1-21
Emission Point: LNMEZ		
Height (ft.): 27	Diameter (in.): 36	Building: 1-04
Emission Point: LSMEZ		
Height (ft.): 27	Diameter (in.): 36	Building: 1-04
Emission Point: MMIX1		
Height (ft.): 30	Diameter (in.): 24	
NYTMN (km.): 4765.556	NYTME (km.): 180.461	Building: 1-04
Emission Point: MMIX2		
Height (ft.): 30	Diameter (in.): 24	
NYTMN (km.): 4765.556	NYTME (km.): 180.46	Building: 1-04
Emission Point: MRE03		
Height (ft.): 30	Diameter (in.): 48	Building: 1-21
Emission Point: MRE04		
Height (ft.): 30	Diameter (in.): 36	Building: 1-21
Emission Point: MRE05		
Height (ft.): 30	Diameter (in.): 48	Building: 1-21
Emission Point: MRE06		
Height (ft.): 30	Diameter (in.): 48	Building: 1-21
Emission Point: MRE15		
Height (ft.): 28	Diameter (in.): 36	



			Building: 1-23
Emission Point: MRE20			
Height (ft.): 29	Diameter (in.): 48		Building: 1-20
Emission Point: MRE23			
Height (ft.): 29	Diameter (in.): 24		Building: 1-24
Emission Point: MRE30			
Height (ft.): 21	Diameter (in.): 24		Building: 1-21
Emission Point: TRNOV			
Height (ft.): 24	Diameter (in.): 36		Building: 1-21

Item 36.5(From Mod 1):

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.): 4765.542	NYTME (km.): 180.472		Building: NE 1-72

Item 36.6(From Mod 0):

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		
NYTMN (km.): 4765.633	NYTME (km.): 180.402		Building: 1-72

Item 36.7(From Mod 0):

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		
NYTMN (km.): 4765.556	NYTME (km.): 180.461		Building: TANKS
Emission Point: BL004			
Height (ft.): 13	Diameter (in.): 3		
NYTMN (km.): 4765.556	NYTME (km.): 180.461		Building: TANKS
Emission Point: CS20C			
Height (ft.): 1	Length (in.): 840	Width (in.): 420	
NYTMN (km.): 4765.559	NYTME (km.): 180.47		Building: TANKS



Emission Point: CS20D
Height (ft.): 27 Diameter (in.): 4
NYTMN (km.): 4765.556 NYTME (km.): 180.461 Building: TANKS

Emission Point: NAOH7
Height (ft.): 13 Diameter (in.): 3
NYTMN (km.): 4765.489 NYTME (km.): 180.509 Building: TANKS

Condition 37: Process Definition By Emission Unit
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 37.1(From Mod 2):

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

Emission Unit: U-MAKOT
Process: MCO Source Classification Code: 3-07-003-99
Process Description:

Two pulp feed systems for viscose production. The pulp feed system will break up the pulp. The pulp will then be sprayed with water or a caustic solution and fed into one of four existing viscose shredders.

Emission Source/Control: 00084 - Process

Emission Source/Control: 00085 - Process

Item 37.2(From Mod 0):

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 63.2 mmbtu/hr each, when firing natural gas as primary fuel.

Emission Source/Control: BOI01 - Combustion

Design Capacity: 63.2 million Btu per hour

Item 37.3(From Mod 0):

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:

Emission Source BOI01 and BOI02, 2 boilers rated at 60.4mmmbtu/hr when firing on # 2 low sulfur oil as backup to natural gas use.

Emission Source/Control: BOI02 - Combustion

Design Capacity: 60.4 million Btu per hour



Item 37.4(From Mod 0):

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 a coater used to apply adhesive.
The coater utilizes a heater to melt the adhesive.

Emission Source/Control: BND01 - Process

Emission Source/Control: BND02 - Process

Item 37.5(From Mod 0):

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:

1. Particulate from material handling operation for process materials used in sponge making located in Bldg. 1-21 and 1-41.
2. Uncaptured emissions from EC cooker, EC mixer, reclamation tank, and ML wash sources (i.e. main stack sources), located in bldg. 1-21 and 1-23.
3. Emissions from viscose handling, the conveying of unwashed sponge blocks, mother liquor collection and storage system, salt crystallizing and handling system, and washing of sponge blocks, located in bldg. 1-20, 1-21, 1-23.
4. Uncaptured emissions from lam line mixers and lam line cook tables located in bldg 1-04.

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: 00080 - Process

Emission Source/Control: 00081 - Process

Emission Source/Control: 00082 - Process

Emission Source/Control: 00083 - Process

Emission Source/Control: 00120 - Process

Emission Source/Control: 00150 - Process

Emission Source/Control: 00151 - Process

Item 37.7(From Mod 0):

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

Emission Unit: U-NCS01

Process: SRU

Source Classification Code: 3-02-032-01

Process Description:

Higher carbon disulfide concentration process sources that vent to carbon absorption control equipment and exhaust out NCS01 (main stack) associated with sponge manufacturing.

Emission Source/Control: 000C1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 000C2 - Control
Control Type: FABRIC FILTER

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: 00030 - Process

Emission Source/Control: 00050 - Process

Emission Source/Control: 00051 - Process



- Emission Source/Control: 00052 - Process
- Emission Source/Control: 00060 - Process
- Emission Source/Control: 00061 - Process
- Emission Source/Control: 00070 - Process
- Emission Source/Control: 00071 - Process
- Emission Source/Control: 00100 - Process
- Emission Source/Control: 00130 - Process
- Emission Source/Control: 00170 - Process
- Emission Source/Control: 00171 - Process
- Emission Source/Control: COT00 - Process
- Emission Source/Control: CR001 - Process
- Emission Source/Control: CS205 - Process
- Emission Source/Control: MIX00 - Process
- Emission Source/Control: VAC00 - Process

Item 37.8(From Mod 0):

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 37.9(From Mod 0):

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: SEP02 - Control



Control Type: THERMAL OXIDATION

Emission Source/Control: SEP01 - Process

Design Capacity: 150 gallons per hour

Item 37.10(From Mod 0):

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, tanks each have one emission point associated with them, the CS204 tank has two. CS20C is the dike where displaced water is aerated to remove carbon disulfide. CS20D is the pressure relief vent line for the tank.

Emission Source/Control: ACID3 - Process

Design Capacity: 11,181 gallons

Emission Source/Control: BL004 - Process

Design Capacity: 12,944 gallons

Emission Source/Control: NAOH7 - Process

Design Capacity: 42,943 gallons

Emission Source/Control: WATBL - Process

Condition 38: Compliance Certification

Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILS

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No owner or operator of an affected facility that combusts oil shall combust oil with a sulfur content of 0.5 percent by weight.

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 1/30/2008.
Subsequent reports are due every 12 calendar month(s).

Condition 39: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILS
Process: 279

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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



Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 40: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILS

Process: 279

Item 40.2:

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 1/30/2008.

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

Condition 41: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 212.10

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-MAKOT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 41.2:

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 1/30/2008.

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

Condition 2-1: Compliance Certification
Effective between the dates of 10/21/2008 and 11/26/2012

Applicable Federal Requirement:6NYCRR 212.4(c)

Item 2-1.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-MAKOT

Process: MCO

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2-1.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The two pulp feed processes venting out emission points MC001 and MC002 emit particulate emissions each limited to the 0.05 grains per dscf limit as stated in the above cited regulation. The amount of particulates emitted will be a function of the amount of water added in the mist coater relative to the pulp feed rate. Since this is a one of a kind system, 3M will stack test one of the two identical emission points to determine appropriate operating limits. An approved stack test must be performed



within 180 days of full operation of the new equipment. A protocol must be submitted for approval 30 days prior to the proposed stack test date. A final report is due within 45 days after the test.

The range of gallons per minute and process rate will be established during the stack test.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: tbd gallons per minute

Reference Test Method: EPA method 5

Monitoring Frequency: CONTINUOUS

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 42: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 42.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Particulate emissions from any process source at the facility is limited to 0.05 grains/dscf of exhaust gases. Sources with baghouse control equipment, such as emission sources 000C1 and 000C2, will monitor baghouse pressure drop once per operating day to insure proper operation. The baghouse pressure drop will be maintained at or below 6.0 inches of water.

Parameter Monitored: PRESSURE DROP

Upper Permit Limit: 6.0 inches of water

Monitoring Frequency: DAILY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED PER
OCCURRENCE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.



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

Condition 43: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:40CFR 63.5505(b), Subpart UUUU

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01

Regulated Contaminant(s):
CAS No: 000075-15-0 CARBON DISULFIDE

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This section of the rule requires facilities using a carbon absorber for control to monitor carbon bed regeneration frequency, stream mass, volumetric flow, temperature etc. in order to insure that the parameters are within those established during the performance test. Since this facility maintains and operates a Continuous Emission Rate Monitoring System (CERMS) for carbon disulfide emissions at the inlet and the outlet of the carbon absorber the performance of the the equipment is considered accurately monitored. Therefore, monitoring of the parameters as mentioned in 40 cfr 63.5505(b), table 2, number 7 is not required.

Substituting a CERMS system in lieu of monitoring carbon bed regeneration parameters is not clearly stated as being allowed in this rule but makes sense. We have confirmed with the EPA project lead on this MACT standard and they are in agreement with this determination.

Maintenance of The CERMS as required elsewhere in this permit will be considered compliance with this condition.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 44: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 212.10

Item 44.1:

The Compliance Certification activity will be performed for:



Emission Unit: U-NCS01

Process: NCS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 44.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The low concentration emission sources vented to E.P NCS01 are unabated and were stack tested in July/August 2002 for capture efficiency and carbon disulfide emissions, the predominant VOC. The NCS sources emit less than 3.0 pounds per hour and are exempt from RACT under 6 NYCRR part 212.10. Compliance with this requirement is met by maintaining production data to demonstrate that all uncontrolled sources emit less than 3 pounds per hour.

All new or modified emission units operating at the facility containing an emission source with a VOC emission rate potential less than 3.0 pounds per hour will require the facility to maintain production data to demonstrate that uncontrolled source are less than 3 pounds per hour.

Parameter Monitored: VOC

Upper Permit Limit: 3.0 pounds per hour

Reference Test Method: EPA method 18 or similiar

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 1/30/2008.

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

Condition 45: Compliance Certification

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 212.9

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01

Process: SRU

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 45.2:

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 periodically. Bypass due to carbon change of the primary adsorbers is expected to also occur periodically, 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 CS₂ 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.

The initial report is due 1/30/2008.

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

Condition 46: Compliance Certification

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 212.10

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01

Process: SRU

Regulated Contaminant(s):

CAS No: 000075-15-0 CARBON DISULFIDE

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

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 %.

A CEM for Carbon Disulfide is also maintained at the inlet and outlet of the SRU for the purpose for determining removal efficiency for VOC's. The CEM data collected for Carbon Disulfide in conjunction with a 92.3% capture efficiency demonstrated during the July 30, 2002 stack testing (modified based on 2006 operating sources) will be used to calculate a weighted average overall control efficiency for VOC emissions from the SRU.

All new or modified emission units operating at the facility containing an emission source with a VOC emission rate potential greater than 3.0 pounds per hour will be required to meet the 81% overall VOC removal efficiency.

Manufacturer Name/Model Number: Servomex xendos

Lower Permit Limit: 81 percent reduction

Reference Test Method: EPA method 18 or similiar

Monitoring Frequency: CONTINUOUS

Averaging Method: 30-DAY AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 47: Compliance Certification

Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01

Process: SRU

Regulated Contaminant(s):

CAS No: 000075-15-0 CARBON DISULFIDE

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The referenced rule requires that the outlet 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 (CS₂) Continuous Emission Rate Monitoring System which consists of infrared monitors for CS₂ 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 (SO₂) 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. 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. NYSDEC's Air Guide 34 contains an appropriate outline for an acceptable Monitoring plan and Quality Assurance plan.
3. 3M must conduct annual RATA testing. 3M will give NYSDEC 30 days notice prior to annual RATA tests. 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 completion of testing.
4. 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 CS₂, COS and SO₂ 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 SO₂ gas must be protocol 1 (NIST traceable). The CS₂ 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 results, corrective action shall be taken and the audit repeated. The results of all audits shall be submitted to the department quarterly.

d. 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. Emissions for periods where the CEM's do not record data will be based on the average emission during the period (CFR 40 5560(c)).

Manufacturer Name/Model Number: Servomex Xendos 2500 NDIR
Parameter Monitored: CARBON DISULFIDE
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: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 3 calendar month(s).

Condition 1-1: Compliance Certification
Effective between the dates of 06/04/2008 and 11/26/2012

Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)

Item 1-1.1:



The Compliance Certification activity will be performed for:

Emission Unit: U-NCS01 Emission Point: NCS01
Process: NCS Emission Source: 00120

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

Item 1-1.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The mother liquor wash table emissions are proposed to increase due to a change in equipment which allows greater throughput. This source previously emitted 2.8 lbs/hr of VOC emissions, and will be permitted to emit 5.0 pounds per hour without control. A Reasonable Available Control technology (RACT) evaluation, per air guide 20, was submitted with the application and a variance is granted upon approval of this permit. Previous stack test data along with production records as well as any other credible information will be used to track emissions from this source. Records must be kept on a monthly basis of sponge block throughput and estimated emissions. Stack testing may be required at the Departments discretion.

A RACT analysis is required once every 5 years and for consistency with other permit conditions, is required to be submitted with the permit renewal application.

Upper Permit Limit: 5.0 pounds per hour
Reference Test Method: EPA appd methods
Monitoring Frequency: MONTHLY
Averaging Method: 24-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 48: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 212.9(b)

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-SEPAR

Regulated Contaminant(s):
CAS No: 000075-07-0 ACETALDEHYDE



CAS No: 000107-02-8 ACROLEIN

Item 48.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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 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. 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.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Reference Test Method: approved EPA methods

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 1/30/2008.

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

Condition 49: Compliance Certification

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement: 40CFR 63.5505(b), Subpart UUUU

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-SEPAR

Item 49.2:



Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Maintain the daily average thermal oxidizer firebox temperature no lower than the value established during the compliance demonstration collecting the thermal oxidizer firebox temperature data according to §63.5545; Reduce the thermal oxidizer firebox temperature data to daily averages; and maintaining the daily average thermal oxidizer firebox temperature no lower than the value established during the compliance demonstration.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 24 HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 50: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement:6NYCRR 212.5(d)

Item 50.1:

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 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Sulfur Dioxide emissions at the facility are limited to 94.24 tpy under 40 CFR part 52.21 subpart A as detailed elsewhere in this permit. Emissions of Sulfur Dioxide (SO₂) from the Thermal Oxidizer (TO) will be continuously monitored and counted towards this CAP. Although the TO will create SO₂ while destroying Carbon Disulfide (CS₂) 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 SO₂ is not required. A Quality Assurance/Quality Control manual must be submitted. The facility may request for an alternative method to monitor



and quantify SO₂ emissions rather than monitoring SO₂ emissions with a CEMS. The facility shall obtain formal approval from the NYSDEC prior to implementing an alternative method to monitor and quantify SO₂ emissions.

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

Manufacturer Name/Model Number: to be determined
Parameter Monitored: SULFUR DIOXIDE
Upper Permit Limit: 28.43 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 1/30/2008.
Subsequent reports are due every 3 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-SEPAR Emission Point: SEPAR

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

Item 51.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A thermal oxidizer is installed and operated to control Volatile Organic Compound (VOC) emissions on the Wet Air Oxidation (WAO) process. February 2006 stack testing demonstrated compliance with Reasonable Available Control Technology (RACT) Requirements with destruction efficiencies of 98% at 1500 degrees F. Continuous monitoring of Temperature will insure compliance with the RACT requirement of at least 81% removal efficiency.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1500 degrees Fahrenheit
Reference Test Method: EPA approved methods



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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 52: Nitrogen unloading and storage system for carbon disulfide.

Effective between the dates of 11/27/2007 and 11/26/2012

Applicable Federal Requirement: 40CFR 63.5505(a), Subpart UUUU

Item 52.1:

This Condition applies to Emission Unit: U-TANKS

Item 52.2:

Install a nitrogen unloading and storage system for carbon disulfide. Maintain a record certifying that a nitrogen unloading and storage system is in use.



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 53: Contaminant List
Effective between the dates of 11/27/2007 and 11/26/2012**

Applicable State Requirement:ECL 19-0301

Item 53.1:

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

CAS No: 000075-07-0
Name: ACETALDEHYDE

CAS No: 000075-15-0



Name: CARBON DISULFIDE

CAS No: 000107-02-8

Name: ACROLEIN

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 007664-93-9

Name: SULFURIC ACID

CAS No: 007783-06-4

Name: HYDROGEN SULFIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

**Condition 54: Unavoidable noncompliance and violations
Effective between the dates of 11/27/2007 and 11/26/2012**

Applicable State Requirement: 6NYCRR 201-1.4

Item 54.1:

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

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

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



owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are 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 55: Air pollution prohibited
Effective between the dates of 11/27/2007 and 11/26/2012

Applicable State Requirement:6NYCRR 211.2

Item 55.1:

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 56: Compliance Demonstration
Effective between the dates of 11/27/2007 and 11/26/2012

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

Item 56.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOILS

Regulated Contaminant(s):



CAS No: 0NY075-00-0 PARTICULATES

Item 56.2:

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 0.20 pounds per million BTU from any oil fired stationary combustion installation. This regulation is enforceable by New York State and has been proposed in the state's implementation plan to replace 6 NYCRR part 227.1b which limits particulate emissions to 0.10 lb/mmbtu. Conditions for 6NYCRR part 227.1b is also listed in this permit. Until the latest version of 227-1 is approved the lower limit will be enforced. A once per permit term stack test, or within 180 days after first use of oil during the permit term, on one of the identical boilers, must be performed while firing #2 oil to demonstrate compliance with the 227-1 limits in this permit. A protocol must be submitted 45 days prior to the proposed test and a report of results submitted within 45 days after the test.

Upper Permit Limit: 0.20 pounds per million Btus

Reference Test Method: epa method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

New York State Department of Environmental Conservation

Permit ID: 9-1464-00164/00117

Facility DEC ID: 9146400164

