



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: Expiration Date:

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 permit is for a RACT variance of control requirements for VOC emissions at a major facility with emission point emissions greater than 3 pounds per hour. The mother liquor wash table identified as emission source 120, will be increasing emissions due to improvements in the process. Previous emissions were documented by stack testing to be 2.8 pounds/hour. Projected emissions are 5 pounds per hour. An air guide 20 RACT analysis resulted in estimated costs for control of approximately \$18,470 per ton, well in excess of the \$4 165 per ton (\$3000/ton 1994 basis adjusted to 2007). The variance is granted upon approval of this permit.

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

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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

Permit Effective Date: Permit Expiration Date:



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

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

23 : Emission Unit Definition
25 : Facility Permissible Emissions

Emission Unit Level

36 : Emission Point Definition By Emission Unit
37 : Process Definition By Emission Unit

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

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

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

53 : Contaminant List



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.

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 Permit Expiration Date

Applicable Federal Requirement:

Item 23.1(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 23.2(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 0):

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): 1-04
1-20
1-21
1-23
1-50

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 25: Facility Permissible Emissions
Effective between the dates of 11/27/2007 and Permit Expiration Date**

Applicable Federal Requirement:

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:

CAS No: 000075-15-0 (From Mod 1) PTE: 675,800 pounds per year
Name: CARBON DISULFIDE

CAS No: 007446-09-5 (From Mod 1) PTE: 188,480 pounds per year
Name: SULFUR DIOXIDE



CAS No: 007664-93-9 (From Mod 1) PTE: 32,000 pounds per year
Name: SULFURIC ACID

CAS No: 007783-06-4 (From Mod 1) PTE: 66,240 pounds per year
Name: HYDROGEN SULFIDE

**** Emission Unit Level ****

Condition 36: Emission Point Definition By Emission Unit
Effective between the dates of 11/27/2007 and Permit Expiration Date

Applicable Federal Requirement:

Item 36.1(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 36.2(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 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 36.6(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 Permit Expiration Date**

Applicable Federal Requirement:

Item 37.1(From Mod 1):

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

Emission Unit: U-NCS01
Process: NCS Source Classification Code: 3-02-032-01
Process Description:
Low carbon disulfide process sources that vent directly
to emission point NCS01 associated with sponge
manufacturing.

Emission Source/Control: 00120 - 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: FNPAN - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: FSPAN - Control

Control Type: MAT OR PANEL FILTER

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: 02001 - Process
- Emission Source/Control: 02002 - Process
- Emission Source/Control: 02003 - Process
- Emission Source/Control: 02004 - Process
- Emission Source/Control: 02101 - Process
- Emission Source/Control: 02102 - Process
- Emission Source/Control: 02103 - Process
- Emission Source/Control: 02104 - Process
- Emission Source/Control: 02105 - Process
- Emission Source/Control: 02106 - Process
- Emission Source/Control: 02107 - Process
- Emission Source/Control: 04001 - Process
- Emission Source/Control: 04002 - Process
- Emission Source/Control: B1000 - Process
- Emission Source/Control: B3000 - Process
- Emission Source/Control: BKFWW - Process
- Emission Source/Control: BKPBS - Process
- Emission Source/Control: FN000 - Process
- Emission Source/Control: FS000 - Process
- Emission Source/Control: MRE15 - Process
- Emission Source/Control: TRNOV - Process

Item 37.6(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 37.7(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 37.8(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 37.9(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 1-1: Compliance Certification
Effective for entire length of Permit

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

New York State Department of Environmental Conservation

Permit ID: 9-1464-00164/00117

Facility DEC ID: 9146400164





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 Permit Expiration Date**

Applicable State Requirement:

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: 000107-02-8



Name: ACROLEIN

CAS No: 000075-15-0

Name: CARBON DISULFIDE

CAS No: 007783-06-4

Name: HYDROGEN SULFIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 007664-93-9

Name: SULFURIC ACID

CAS No: 0NY998-00-0

Name: VOC

New York State Department of Environmental Conservation

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Facility DEC ID: 9146400164

