



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2936-00017/02003
Mod 0 Effective Date: 04/03/2008 Expiration Date: No expiration date.
Mod 1 Effective Date: 05/05/2011 Expiration Date: No expiration date.

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

Facility: FMC CORP AGRICULTURAL PRODUCTS GROUP
100 NIAGARA ST
MIDDLEPORT, NY 14105

Contact: ROBERT C WOJCIK
FMC COORPORATION
100 NIAGARA ST
MIDDLEPORT, NY 14105
(716) 735-3761

Description:
FMC Agricultural Products located in Middleport, N.Y. blends and packages insecticides, fungicides and herbicides as liquids or powders for agricultural use.

This Air State Facility application incorporates monitoring conditions for the emissions control equipment associated with the various formulation processes. Emissions occurring from the mixing, blending and packaging operations can be volatile and particulate compounds. Emissions of organic vapors and particulate pesticides, except for the inert particulates subject to 212.4(c), are subject to the control requirements of 6NYCRR, Part 212.4(b) and Table 2 of 6NYCRR, Part 212.9 and are assigned an environmental rating of 'A' requiring 99% control. These emissions are controlled by baghouses and activated carbon, often in series.



By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: DOUGLAS E BORSCHER
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

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



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



Condition 1-1: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-1.1:

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

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

Condition 4: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 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 1-2: Submission of application for permit modification or renewal-REGION 9

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 1-2.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165



Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

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

New York State Department of Environmental Conservation

Permit ID: 9-2936-00017/02003

Facility DEC ID: 9293600017



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

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1735 MARKET ST
PHILADELPHIA, PA 19103

Facility: FMC CORP AGRICULTURAL PRODUCTS GROUP
100 NIAGARA ST
MIDDLEPORT, NY 14105

Authorized Activity By Standard Industrial Classification Code:
2879 - AGRICULTURAL CHEMICALS, NEC

Mod 0 Permit Effective Date: 04/03/2008
date.

Permit Expiration Date: No expiration
date.

Mod 1 Permit Effective Date: 05/05/2011
date.

Permit Expiration Date: No expiration
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LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-1 6 NYCRR 212.4 (b): Compliance Demonstration
- 1-2 6 NYCRR 212.6 (a): Compliance Demonstration

Emission Unit Level

EU=0-00231,Proc=235

- 1-3 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00231,Proc=236

- 1-4 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00231,Proc=ECF

- 1-5 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00231,Proc=WET

- 1-6 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00313,Proc=314

- 1-7 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00313,Proc=H71

- 1-8 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00313,Proc=TAN

- 1-9 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00651

- 1-10 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00654

- 1-11 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00702

- 1-12 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00704,Proc=PKG

- 1-13 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00704,Proc=TWO

- 1-14 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00705

- 1-15 6 NYCRR 212.4 (c): Compliance Demonstration
- 1-16 6 NYCRR 212.4 (c): Compliance Demonstration

EU=0-00711

- 1-17 6 NYCRR 212.4 (b): Compliance Demonstration



EU=0-00741,Proc=AIR

1-18 6 NYCRR 212.4 (b): Compliance Demonstration

EU=0-00741,EP=00801,Proc=LIM

1-19 6 NYCRR 212.4 (c): Compliance Demonstration

EU=0-02314

1-20 6 NYCRR 212.4 (b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

17 ECL 19-0301: Contaminant List

18 6 NYCRR 201-1.4: Unavoidable noncompliance and violations

1-21 6 NYCRR 201-1.4: Unavoidable noncompliance and violations

19 6 NYCRR Subpart 201-5: Emission Unit Definition

1-22 6 NYCRR 201-5.4: Compliance Demonstration

20 6 NYCRR 211.2: Air pollution prohibited

1-23 6 NYCRR 211.2: Visible Emissions Limited

21 6 NYCRR 211.2: Compliance Demonstration

Emission Unit Level

22 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit

23 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



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

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

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

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

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

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

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

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

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

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



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

Item K: Visible Emissions Limited - 6 NYCRR 211.3

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

Item L: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item M: Permit Exclusion - ECL 19-0305

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

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

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



regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1-1: Compliance Demonstration
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-1.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

This permit describes various monitoring requirements for process emission sources associated with the formulation and packaging of insecticides and herbicides. Contaminants having an emission rate potential from a source in excess of 1 pound per hour of volatile and/or particulate matter (unless otherwise noted in a specific monitoring condition) are assigned an 'A' environmental rating and require a minimum of 99% control.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 99 percent reduction

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-2: Compliance Demonstration
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 1-2.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00231

Emission Unit: 0-00702

Emission Unit: 0-00704

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Emission Unit: 0-00705

Emission Unit: 0-00711

Emission Unit: 0-02314

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any emission source or point are prohibited, except only emissions of uncombined water.

FMC shall document and evaluate any observed visible emissions or fallout and initiate corrective action. Records shall be maintained and made available to Department representatives on request.

The Department has the right to request or conduct a Method 9 opacity observation at any time.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 1-3: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00231

Process: 235

Regulated Contaminant(s):

CAS No: 052315-07-8

CYCLOPROPANECARBOXYLIC
ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME

New York State Department of Environmental Conservation

Permit ID: 9-2936-00017/02003

Facility DEC ID: 9293600017



CAS No: 052645-53-1 PERMETHRIN
CAS No: 055285-14-8
CARBAMIC ACID,
((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL
CAS No: 064742-94-5 NAPHTHA HEAVY AROMATIC
CAS No: 064742-95-6 NAPHTHA, LIGHT AROMATIC
CAS No: 082657-04-3 BIFENTHRIN

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Pesticide products are formulated in this mixing tank using active and inert ingredients-water, solvents such as Aromatic 100 and 200 (aromatic naphthas)and emulsifiers. All emissions associated with the holding tank and packing line are vented to the FARR Glide Pack activated carbon filter which will be replaced on an annual basis. The facility shall keep records of the filter replacement date on-site for a period of 5 years and make these records available to Department representatives on request.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-4: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00231

Process: 236

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Dry materials enter a mixing tank through a hopper that vents to a baghouse emission point 236. The magnehelic readings are to be recorded daily when operational. Readings outside the normal operating range will require inspection and maintenance procedures for the baghouse be implemented. Records of pressure drop readings and

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maintenance performed are to be kept on-site for a period of 5 years and made available to Department representatives on request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: DAILY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED

RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-5: Compliance Demonstration
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00231

Process: ECF

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of volatile organic compounds from the insecticide emulsifier formulation process will be directed to a Calgon High Velocity carbon unit. The carbon unit will be changed annually and records of the change-out are to be kept on-site and made available to Department representatives on request.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-6: Compliance Demonstration
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00231

Process: WET

New York State Department of Environmental Conservation

Permit ID: 9-2936-00017/02003

Facility DEC ID: 9293600017



Regulated Contaminant(s):
CAS No: 052315-07-8
CYCLOPROPANECARBOXYLIC
ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME
CAS No: 052645-53-1 PERMETHRIN
CAS No: 082657-04-3 BIFENTHRIN

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A primary and secondary baghouse are used to control emissions of particulate material containing insecticides such as Bifenthrin, Permethrin or Cypermethrin. A Tribuflor particulate detector will sound an alarm if baghouse breakthrough occurs.

The baghouse is equipped with a magnehelic gauge which has an upper limit of 7 and lower limit of 1. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

An end of line Carbon Glide Pac unit will be used to remove organic compounds and will be changed annually.

Records of carbon change along with pressure drop readings are to be kept on-site for a period of five years and made available to Department representatives on request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-7: Compliance Demonstration
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

New York State Department of Environmental Conservation

Permit ID: 9-2936-00017/02003

Facility DEC ID: 9293600017



Item 1-7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00313

Process: 314

Regulated Contaminant(s):

CAS No: 064742-94-5 NAPHTHA HEAVY AROMATIC

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The activated carbon drums used to control volatile emissions from the Aromatic 200 storage tank will be changed on an annual basis. Records of all carbon change-out will be kept on-site for a period of 5 years and made available to Department representatives on request.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-8: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00313

Process: H71

Regulated Contaminant(s):

CAS No: 081777-89-1

2-(2-CHLOROPHENYL)METHYL-4,4-DIMETHYL-3-ISOXAZOL-IDINONE

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The method described will be used to monitor for Clomazone breakthrough from the activated carbon unit (emission point 00712) at the Command 3ME formulation process.

Two downwind ambient air samples will be collected monthly when operating within 100 yards of the stack and 100 feet



apart from each other when the Command formulation is in operation.

If the clomazone level exceeds 2 ug/cu meter, a second sample will be collected on the day following the receipt of the results.

If the second sample also detects Clomazone, the system will be shut down for a maintenance check. The maintenance check will review the process for potential changes in flow rates, operating pressure, and product loading. In addition, the carbon in the tank will be checked for potential channeling of carbon.

A follow-up sample will then be taken. If this sample shows Clomazone breakthrough, and if all process systems are within normal operating parameters, the system will be shut down and the carbon will be replaced.

Records of all sampling and carbon change shall be kept on-site for a period of 5 years and made available to Department representatives on request.

Parameter Monitored:

2-(2-CHLOROPHENYL)METHYL-4,4-DIMETHYL-3-ISOXAZOL-IDINONE

Upper Permit Limit: 2 micrograms per cubic meter

Reference Test Method: NIOSH Method 5602

Monitoring Frequency: MONTHLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-9: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00313

Process: TAN

Regulated Contaminant(s):

CAS No: 081777-89-1

2-(2-CHLOROPHENYL)METHYL-4,4-DIMETHYL-3-ISOXAZOL-IDINONE

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

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



Monitoring Description:

The ventilation for the Clomazone storage tank will run through two in-line Vent Sorb activated carbon drums. Monthly testing of the drums over a time period of one year showed no indication of breakthrough. Therefore, every six months the second unit will be moved to the lead unit and a new carbon unit be installed as the polish (i.e. second) unit to ensure adequate protection in the event of a release.

The facility shall keep records of all carbon drum change-out on-site for a period of 5 years and make this information available to Department representatives on request.

Parameter Monitored:

2-(2-CHLOROPHENYL)METHYL-4,4-DIMETHYL-3-ISOXAZOL-IDINONE

Lower Permit Limit: 99 percent degree of air cleaning or greater

Monitoring Frequency: SEMI-ANNUALLY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-10: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00651

Regulated Contaminant(s):

CAS No: 008003-34-7 PYRETHRUM

CAS No: 052315-07-8

CYCLOPROPANECARBOXYLIC

ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME

CAS No: 055285-14-8

CARBAMIC ACID,

((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL

CAS No: 082657-04-3 BIFENTHRIN

Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Volatile emissions from the packaging area are directed through a Calgon High Flow Ventsorb activated carbon unit (HVC). The carbon in the HVC canister will be replaced



annually. Records of carbon change will be recorded and kept on-site for a period of five years and made to Department representatives on request.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-11: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00654

Regulated Contaminant(s):

CAS No: 001563-66-2

2,3-DIHYDRO-2,2-DIMETHYL-7-BENZOFURANYL

METHYLCARBAMATE

Item 1-11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Tote bins of Carbofuran are dumped into a hopper and conveyed to the processing area. Ventilation air is discharged through a baghouse for collection of particulate material. A Tribuflo particulate detector will sound an alarm if particulate breakthrough occurs.

The baghouse is equipped with a magnehelic gauge which has an upper limit of 7 and lower limit of 1. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

An end of line Carbon Glide Pac unit will be used to remove organic compounds and will be changed annually.

Records of carbon change along with pressure drop

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readings are to be kept on-site for a period of five years and made available to Department representatives on request.

Manufacturer Name/Model Number: Magnehelic/Tributoto detector
Parameter Monitored: PRESSURE DROP
Lower Permit Limit: 1 inches of water
Upper Permit Limit: 7 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-12: Compliance Demonstration
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00702

Regulated Contaminant(s):

CAS No: 082657-04-3 BIFENTHRIN

CAS No: 001563-66-2

2,3-DIHYDRO-2,2-DIMETHYL-7-BENZOFURANYL METHYLCARBAMATE

Item 1-12.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Furadan(Carbofuran) dust base is formulated in this area.

Four connecting areas general ventilation ducts flow through a primary baghouse used for collection of particulate material followed by a Tribuflo particulate detector. The detector will sound an alarm if baghouse breakthrough causes material to pass by the collector.

The baghouse is equipped with a magnehelic gauge which has an upper limit of 7 and lower limit of 1. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs



taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

An end of line Carbon Glide Pac unit will be used to remove organic compounds and will be changed annually.

Records of carbon change along with pressure drop readings are to be kept on-site for a period of five years and made available to Department representatives on request.

An end of line Carbon Glide Pac unit will be used to remove excess odors and will be changed annually.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-13: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00704

Process: PKG

Regulated Contaminant(s):

CAS No: 064742-94-5 NAPHTHA HEAVY AROMATIC

CAS No: 064742-95-6 NAPHTHA, LIGHT AROMATIC

Item 1-13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The TIGG activated carbon filter associated with the holding tank and packing line will be replaced on an annual basis. The facility shall maintain records of the replacement date on-site for a period of 5 years and made available to Department representatives on request.



Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-14: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (b)

Item 1-14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00704

Process: TWO

Regulated Contaminant(s):

CAS No: 082657-04-3 BIFENTHRIN

CAS No: 001563-66-2

2,3-DIHYDRO-2,2-DIMETHYL-7-BENZOFURANYL

METHYLCARBAMATE

Item 1-14.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Carbofuran and Bifenthrin-based products are formulated in this area. A baghouse is used for collection of particulate material followed by a Tribuflor particulate detector. The detector will sound an alarm if baghouse breakthrough occurs.

The baghouse is equipped with a magnehelic gauge which has an upper limit of 13 and lower limit of 7. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

An end of line Carbon Glide Pac unit will be used to remove organic compounds and will be changed annually.

Records of carbon change along with pressure drop readings are to be kept on-site for a period of five years and made available to Department representatives on request.

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Parameter Monitored: PRESSURE DROP
Lower Permit Limit: 7 inches of water
Upper Permit Limit: 13 inches of water
Monitoring Frequency: PER SHIFT
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-15: Compliance Demonstration
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 1-15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00705

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

Item 1-15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions from the blending and handling operations of clays and inert materials are not to exceed 0.05 gr/dscf. A baghouse will control emissions and pressure drops will be recorded and monitored.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.05 grains per dscf
Reference Test Method: Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-16: Compliance Demonstration
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 1-16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00705

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



Item 1-16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Clays and wetting agents are blended as a diluent for products in this area. A fabric filter is used for the collection of particulate material followed by a Tribuflor particulate detector. The detector will alarm if breakthrough occurs.

The baghouse is equipped with a magnehelic gauge which has an upper limit of 7 and lower limit of 1. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

Records of pressure drop readings are to be kept on-site for a period of five years and made available to Department representatives on request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-17: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (b)

Item 1-17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00711

Regulated Contaminant(s):

CAS No: 000115-29-7

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1-4-5-6-7-7 HEXACHLORO-5-NORBORENE-2-3DIMETHANOL CYCLIC
SULF

CAS No: 052315-07-8
CYCLOPROPANECARBOXYLIC
ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME
CAS No: 052645-53-1 PERMETHRIN

CAS No: 055285-14-8
CARBAMIC ACID,
((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL
CAS No: 067375-30-8

CYCLOPROPANECARBOXYLIC
ACID,3-(2,2-DICHLOROETHENYL)-ALPHA
CAS No: 0NY075-00-0 PARTICULATES
CAS No: 082657-04-3 BIFENTHRIN

Item 1-17.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A primary and secondary baghouse are used for the collection of particulate material followed by a Tribuflor particulate detector.

The baghouse is equipped with a magnehelic gauge which has an upper limit of 7 and lower limit of 1. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

An end of line Carbon Glide Pac unit will be used to remove organic compounds and will be changed annually.

Records of carbon change along with pressure drop readings are to be kept on-site for a period of five years and made available to Department representatives on request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

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Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-18: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (b)

Item 1-18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00741

Process: AIR

Regulated Contaminant(s):

CAS No: 000071-43-2 BENZENE

CAS No: 000075-09-2 DICHLOROMETHANE

CAS No: 000067-66-3 CHLOROFORM

Item 1-18.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Under the requirements of a RCRA Administrative Order on Consent, entered into by FMC, NYSDEC and USEPA, groundwater containing various site-related constituents is extracted and directed to an air stripper. This system includes extraction of groundwater from ten extraction wells that are primarily impacted with methylene chloride. A low-profile air stripper located at Building 74 removes volatile organic compounds before directing the groundwater to the wastewater treatment plant at the west end of the property. A flow rate monitor records the GPM through the air stripper.

The air stripper was replaced in May of 2006. An Air Guide-1 analysis was conducted at that time using concentrations from a grab sample taken from the air stripper influent tank. The results indicated that based on continuous operation of the air stripper with a 45 gallons per minute (gpm) influent flow rate and at the specified concentration, the potential annual impacts for chloroform, methylene chloride, and benzene exceed their respective AGC's. However, the 45 gpm rate is a maximum instantaneous and the short term concentrations based on that flow were not exceeded for any contaminant of concern.



At the average (24-hour average) flow rate of 10 gpm to the stripper influent tank, the annual impacts were not exceeded. However, at 12 gpm, modeling showed the impacts approaching the AGC for chloroform and methylene chloride.

At the end of each calendar year, FMC shall determine the average annual flow rate and take a water grab sample for analysis from the stripper influent tank. If the extraction well yields increase and the average annual flow rate exceeds 12 gpm, or the influent concentrations increase from those in Table 1 of the May 11, 2006 letter, the ambient impacts are to be re-evaluated and submitted to this Department. Results of the sampling along with the average annual flow rate shall be submitted to this Department at the end of each calendar year until it is determined that annual sampling is no longer required.

Parameter Monitored: FLOW RATE

Upper Permit Limit: 12 gallons per minute

Monitoring Frequency: ANNUALLY

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-19: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 1-19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00741

Emission Point: 00801

Process: LIM

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-19.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Particulate emissions from the lime addition system shall not exceed 0.05 gr/dscf. Visible emissions or dust fallout will require the facility to inspect, clean, and if required change cartridge filters.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: Method 5

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-20: Compliance Demonstration Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 1-20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-02314

Regulated Contaminant(s):

CAS No: 001563-66-2 2,3-DIHYDRO-2,2-DIMETHYL-7-BENZOFURANYL METHYLCARBAMATE

METHYLCARBAMATE

CAS No: 007664-38-2 PHOSPHORIC ACID

CAS No: 055285-14-8

CARBAMIC ACID,

((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL

CAS No: 082657-04-3 BIFENTHRIN

CAS No: 0NY998-00-0 VOC

CAS No: 095465-99-9 CADUSAFOS

Item 1-20.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A dry and liquid microencapsulating operation has both a baghouse for dust and ventsorb activated carbon unit for VOC emissions. Cadusafos(Rugby) is the final product packaged.

The baghouse is equipped with a magnehelic gauge which has an upper limit of 7 and lower limit of 1. If readings are outside this range, the baghouse is to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

A Vent Sorb carbon unit (three in series) will remove volatile emissions from the liquid line. The carbon will

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be changed semi-annually. Records of carbon change along with pressure drop readings are to be kept on-site for a period of five years and made available to Department representatives on request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 17: Contaminant List

Effective between the dates of 04/03/2008 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 17.1:

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

CAS No: 000067-66-3

Name: CHLOROFORM

CAS No: 000071-43-2

Name: BENZENE

CAS No: 000075-09-2

Name: DICHLOROMETHANE

CAS No: 000115-29-7

Name: 1-4-5-6-7-7 HEXACHLORO-5-NORBORENE-2-3DIMETHANOL

CYCLIC SULF

CAS No: 001563-66-2

Name: 2,3-DIHYDRO-2,2-DIMETHYL-7-BENZOFURANYL

METHYLCARBAMATE

CAS No: 007664-38-2

Name: PHOSPHORIC ACID

CAS No: 008003-34-7

Name: PYRETHRUM

CAS No: 052315-07-8

Name: CYCLOPROPANECARBOXYLIC

ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME

CAS No: 052645-53-1

Name: PERMETHRIN

CAS No: 055285-14-8

Name: CARBAMIC ACID,

((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL

CAS No: 064742-94-5

Name: NAPHTHA HEAVY AROMATIC

CAS No: 064742-95-6

Name: NAPHTHA, LIGHT AROMATIC

CAS No: 067375-30-8



Name: CYCLOPROPANECARBOXYLIC
ACID,3-(2,2-DICHLOROETHENYL)-ALPHA

CAS No: 081777-89-1

Name:

2-(2-CHLOROPHENYL)METHYL-4,4-DIMETHYL-3-ISOXAZOL-IDINONE

CAS No: 082657-04-3

Name: BIFENTHRIN

CAS No: 095465-99-9

Name: CADUSAFOS

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 18: Unavoidable noncompliance and violations
Effective between the dates of 04/03/2008 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 18.1:

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 1-21: Unavoidable noncompliance and violations
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-21.1:

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 19: Emission Unit Definition

Effective between the dates of 04/03/2008 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1(From Mod 1):

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

Emission Unit: 0-00231

Emission Unit Description:

Formulation of liquid and wettable powder insecticides.

Building(s): 23

72

Item 19.2(From Mod 1):

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

Emission Unit: 0-00313

Emission Unit Description:

The Command 3ME herbicide formulation process.

Ventilation is provided for the mixing tanks, the packaging lines and work areas. A Tigg NB 15 canister containing 12000 lbs of activated carbon scrubs the ventilation air and exhausts through emission point 00712.

Storage tank ventilation (emission point 00313) for Command technical tank. Two activated carbon ventsorb drums absorb residual vapors from the clomazone storage tank, breathing ventilation only. This emission unit also describes a 10,000 gallon Aromatic 200 storage tank



identified as emission point 00314.

Building(s): 23
71

Item 19.3(From Mod 1):

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

Emission Unit: 0-00651

Emission Unit Description:

Packaging of products into containers. The emission point 00651 provides room ventilation for the 300 gallon holding tank, the product fill lines and from the general work area.

Building(s): 65

Item 19.4(From Mod 1):

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

Emission Unit: 0-00654

Emission Unit Description:

Carbofuran technical handling system. Tote bins of Carbofuran are dumped into one of two hoppers located in Building 65, then conveyed to the processing area. Ventilation air for the system is discharged through a fabric collector and Glide Pack carbon filter.

Building(s): 65

Item 19.5(From Mod 1):

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

Emission Unit: 0-00702

Emission Unit Description:

Main pesticide formulation area includes general ventilation recycle area, flowable mixing area, east and west product line areas. The east and west air streams pass through an Airguard fabric filter system and activated carbon prior to discharge at emission point 00702. The general ventilation is a large baghouse that flows through an Airguard fabric filter system and activated carbon.

Building(s): 70

Item 19.6(From Mod 1):

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

Emission Unit: 0-00704

Emission Unit Description:

This emission unit describes packaging operations. Two areas, export packaging and flowable milling and packaging areas are associated with Carbofuran and Bifentrin based materials. Emission are directed to a baghouse, fabric filter pack and carbon and exhausted to emission point



000704. There is also a packaging line to fill various sized containers with liquid formulation from a holding tank, vapors are vented through activated carbon filters and to emission point 07020.

Building(s): 70

Item 19.7(From Mod 1):

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

Emission Unit: 0-00705

Emission Unit Description:

Clay handling system for Carbofuran manufacturing area. Emissions are directed to a fabric filter dust collector emission point 00705.

Building(s): 70

Item 19.8(From Mod 1):

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

Emission Unit: 0-00711

Emission Unit Description:

Form fill and seal ventilation system. Packaging of powders only. There is a primary and secondary dust collector followed by a Glide Pack carbon filter and vented to emission point 00535.

Building(s): 71

Item 19.9(From Mod 1):

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

Emission Unit: 0-00741

Emission Unit Description:

Wastewater treatment. Extraction of groundwater contaminated with methylene chloride from ten extraction wells via a low profile air stripper located in Building 74 (emission point 00741) and then directed to the on-site Water Treatment Plant.

This emission unit also includes the lime addition to water treatment plant. Dust is controlled by a fabric filter and vented to emission point 00801.

Building(s): 74
80

Item 19.10(From Mod 1):

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

Emission Unit: 0-02314

Emission Unit Description:

Formulation of Cadusafos (Rugby TM) liquid, microencapsulated product. Particulate emission of dry product are controlled by a fabric filter and directed to emission point 02314. Volatile organic compound emissions

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are controlled by three vent fed FARR activated carbon glide pack.

Building(s): 23

Item 19.11(From Mod 0):

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

Emission Unit: 0-00314

Emission Unit Description:

Ventilation

Building(s): 23

Item 19.12(From Mod 0):

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

Emission Unit: 0-00801

Emission Unit Description:

DUST HOUSE FROM LIME ADDITION TO WATER TREATMENT PLANT.

Building(s): 80

Condition 1-22: Compliance Demonstration

Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-5.4

Item 1-22.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational flexibility protocol FMC:

FMC formulates and packages liquid and powdered pesticides. Processes consist of mixing and blending and packaging. Emissions consist of particulate and organic compounds and are controlled by baghouses and activated carbon.

For the evaluation of Part 212 sources:

1. The facility may initiate new product formulations and construct new process emission sources involving mixing and blending and packaging without a permit modification provided:

(a) Changes do not cause emissions to exceed any emission limitation contained in regulations or applicable



requirements.

(b) Changes do not cause the source to become subject to any additional regulations or requirements.

(c) Changes do not seek to establish or modify a federally-enforceable emission cap or limit.

(d) Changes do not require additional controls to achieve compliance.

These changes may be constructed without prior approval. However, a change that meets these criteria and also involves relocation of emission points, emission of any air pollutant not previously authorized or emitted, or installation or alteration of any air cleaning device will require a 30 day letter submitted to the Region 9 Buffalo office at 270 Michigan Avenue, Buffalo, 14203.

2. FMC will be allowed to proceed with the new product formulation/emission source/emission point without re-opening the permit by submitting the following information 30 days prior to such changes and shall include:

(a) A detailed process description of the process and control equipment involved and process flow diagram and the date on which the change will occur.

(b) The facility shall identify the type of contaminants emitted, provide calculations of emission rate potentials, hourly actual emissions, and projected annual emissions for the proposed product/process.

(c) Submit all stack parameters for the emission point as required on the permit application.

(d) A revised facility site map showing the location of the new emission source/point, distance to property line and nearest off-site receptor.

3. An Air Guide-1 evaluation of annual and short term emission impacts shall be conducted using the potential hourly and annual emissions and stack data and site location information as submitted in Item 2.

4. Modification of existing permit terms and conditions will require a permit modification.

5. For inert particulate materials such as lime or clay, emissions will be subject to the 0.05 grain/dscf limit.



6. Particulate (powdered) pesticide products are assigned an 'A' environmental rating and an hourly emission rate potential in excess of 1 pound per hour will require a minimum of 99% control. Use of a fabric filter followed by activated carbon is an acceptable demonstration of the required control efficiency.

7. Potential emissions (8760 hours of operation) of any individual hazardous air pollutant (HAP) in excess of 10 tons and/or combined HAPs in excess of 25 tons will require an emission cap and require a permit modification.

At any time, the Department may require a permit modification to impose additional permit requirements or special conditions if as a result of the proposed changes if it is determined that there is an air quality impact which triggers additional requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 20: Air pollution prohibited
Effective between the dates of 04/03/2008 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 20.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 1-23: Visible Emissions Limited
Effective between the dates of 05/05/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 1-23.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted



Emission Unit: 0-00231

Emission Point: 00231
Height (ft.): 46 Diameter (in.): 24
NYTMN (km.): 4789.6 NYTME (km.): 218.1 Building: 23

Emission Point: 00235
Height (ft.): 46 Diameter (in.): 18
NYTMN (km.): 4789.7 NYTME (km.): 218.1 Building: 23

Emission Point: 00236
Height (ft.): 30 Diameter (in.): 8
NYTMN (km.): 4789.65 NYTME (km.): 218.1 Building: 23

Emission Point: 07210
Height (ft.): 39 Diameter (in.): 6
NYTMN (km.): 4789.758 NYTME (km.): 218.03 Building: 72

Item 22.2(From Mod 1):

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

Emission Unit: 0-00313

Emission Point: 00313
Height (ft.): 16 Diameter (in.): 3
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 23

Emission Point: 00314
Height (ft.): 39 Diameter (in.): 24
NYTMN (km.): 4789.7 NYTME (km.): 218.1 Building: 23

Emission Point: 00712
Height (ft.): 15 Diameter (in.): 22
NYTMN (km.): 4789.65 NYTME (km.): 218.1 Building: 71

Item 22.3(From Mod 1):

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

Emission Unit: 0-00651

Emission Point: 00651
Height (ft.): 36 Diameter (in.): 6
NYTMN (km.): 4789.65 NYTME (km.): 218.1 Building: 65

Item 22.4(From Mod 1):

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

Emission Unit: 0-00654

Emission Point: 00654
Height (ft.): 60 Diameter (in.): 24
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 65



Item 22.5(From Mod 1):

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

Emission Unit: 0-00702

Emission Point: 00702

Height (ft.): 42 Diameter (in.): 66
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 70

Item 22.6(From Mod 1):

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

Emission Unit: 0-00704

Emission Point: 00704

Height (ft.): 42 Diameter (in.): 30
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 70

Emission Point: 07020

Height (ft.): 39 Diameter (in.): 6
NYTMN (km.): 4789.65 NYTME (km.): 218.1 Building: 70

Item 22.7(From Mod 1):

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

Emission Unit: 0-00705

Emission Point: 00705

Height (ft.): 34 Diameter (in.): 20
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 70

Item 22.8(From Mod 1):

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

Emission Unit: 0-00711

Emission Point: 00535

Height (ft.): 44 Diameter (in.): 20
NYTMN (km.): 4789.6 NYTME (km.): 218.1 Building: 71

Item 22.9(From Mod 1):

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

Emission Unit: 0-00741

Emission Point: 00741

Height (ft.): 35 Diameter (in.): 8
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 74

Emission Point: 00801

Height (ft.): 35 Diameter (in.): 12



NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 80

Item 22.10(From Mod 1):

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

Emission Unit: 0-02314

Emission Point: 02314

Height (ft.): 44

Diameter (in.): 19

NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 23

Condition 23: Process Definition By Emission Unit
Effective between the dates of 04/03/2008 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 23.1(From Mod 1):

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

Emission Unit: 0-00231

Process: 235

Source Classification Code: 3-01-033-11

Process Description:

Liquid insecticides are formulated in a mixing tank using water, non-flammable solvents and emulsifiers. Emissions from the mixing tank, packaging lines and room ventilation of the work area are vented through FARR activated carbon glide packs and to emission point 00235.

Emission Source/Control: 0235B - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00235 - Process

Item 23.2(From Mod 1):

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

Emission Unit: 0-00231

Process: 236

Source Classification Code: 3-01-033-11

Process Description:

A baghouse (emission point 236) provides dust control while dry raw materials are added through a hopper into a mixing tank. The primary purpose is to minimize worker exposure to dusts when dumping raw materials.

Emission Source/Control: 0236C - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00236 - Process

Item 23.3(From Mod 1):

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



Emission Unit: 0-00231

Process: ECF

Process Description:

Insecticide emulsifiable concentrates (EC) formulation area: mixes and packages solvent-based insecticides. solvent is added to the mixing tank from outside storage tanks, tote bins or drums. Insecticides and emulsifiers are added from drums or totes. The ventilation system removes solvent vapors from various mixing and packaging operations and work areas.

Emission Source/Control: 7210A - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 7210B - Process

Emission Source/Control: 7210C - Process

Emission Source/Control: T7810 - Process

Emission Source/Control: T7820 - Process

Emission Source/Control: T7830 - Process

Item 23.4(From Mod 1):

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

Emission Unit: 0-00231

Process: WET

Source Classification Code: 3-01-033-11

Process Description:

Formulation, including milling and mixing, of wettable powders containing Bifenthrin, Permethrin or Cypermethrin insecticides in building 23. Active ingredients are added to inert clays and wetting powders. Material is blended and milled to achieve proper assay and particle size. Product/particulates are collected by a primary and secondary dust collector followed by an activated carbon Glide Pack and directed to emission point 00231. The particle collector captures 99% of product and returns to formulation process.

Emission Source/Control: 00230 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00231 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0A231 - Process

Item 23.5(From Mod 1):

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



Emission Unit: 0-00313
Process: 314 Source Classification Code: 4-07-016-12
Process Description:
Aromatic 200 solvent is stored in a 10,000 gallon storage tank. Emissions travel through a closed-loop system and pass through three activated carbon drums in series and back to the tank. There is a conservation vent that allows air into or out of the tank as necessary. The carbon consists of three 55 gallon Vent Sorb drums.

Emission Source/Control: 0A314 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0B314 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0C314 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00314 - Process

Item 23.6(From Mod 1):

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

Emission Unit: 0-00313
Process: H71 Source Classification Code: 3-01-033-11
Process Description:
Formulation of Command 3ME herbicide. The process microencapsulates the herbicide molecule. Emissions are controlled by an activated carbon cannister and exhausted to emission point 00712.

Emission Source/Control: 00712 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0712B - Process

Item 23.7(From Mod 1):

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

Emission Unit: 0-00313
Process: TAN Source Classification Code: 3-01-033-11
Process Description:
Two 55 gallon activated carbon units absorb residual vapors from the heated clomazone storage tank. Air is displaced to vent identified as emission point 00313 while filling the storage tank from tanker trucks.

Emission Source/Control: 00313 - Control
Control Type: ACTIVATED CARBON ADSORPTION



Emission Source/Control: 0A313 - Process

Item 23.8(From Mod 1):

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

Emission Unit: 0-00651

Process: NEW

Source Classification Code: 3-01-033-11

Process Description:

Formulated product is packaged in containers ranging from one pint to thirty gallons. The products packaged include carbofuran, clomazone, bifenthrin, permethrin and cypermethrin.

Emission Source/Control: 00651 - Control

Control Type: VAPOR RECOVERY SYSTEM (VAPOR ADSORPTION/ABSORPTION UNIT)

Emission Source/Control: 0A651 - Process

Emission Source/Control: 0B651 - Process

Item 23.9(From Mod 1):

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

Emission Unit: 0-00654

Process: CAR

Source Classification Code: 3-01-033-11

Process Description:

Technical carbofuran from tote bins is charged into one of two hoppers located in building 65 and transported by way of bucket elevators and a series of screw conveyors to a ribbon blender located in the Furadan processing area. From this blender the material is discharged to existing carbofuran technical handling systems which feed the various processing system. Particulates pass through a fabric filter and any volatile compounds are captured by carbon.

Emission Source/Control: 00654 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00655 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0A654 - Process

Item 23.10(From Mod 1):

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

Emission Unit: 0-00702

Process: PES

Source Classification Code: 3-01-033-11

Process Description:

Pesticide formulation area. Includes general ventilation

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filter, dry rooms, recycle area flowable mixing area. The four areas are connected to a common stack. Material is collected into a product collector, then through a duct house and then through carbon filters. The product formulated is furadan (carbofuran) dust base.

Emission Source/Control: 00702 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0A702 - Process

Item 23.11(From Mod 1):

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

Emission Unit: 0-00704
Process: PKG Source Classification Code: 3-01-033-11
Process Description:

Packaging line to fill small containers of formulated liquid pesticide product. Products are placed into a 3000 gallon holding tank. Product from the holding tank goes to a 50 gallon head tank from which containers are filled. Solvent vapors are controlled by activated carbon.

Emission Source/Control: 07020 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 7020A - Process

Item 23.12(From Mod 1):

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

Emission Unit: 0-00704
Process: TWO Source Classification Code: 3-01-033-11
Process Description:

Packaging line to fill small containers of formulated liquid pesticide product. The holding tank is filled from totes or drums. Product from the holding tank goes to a head tank from which containers are filled. Solvent vapors are controlled by activated carbon.

Emission Source/Control: 00700 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00704 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0A704 - Process

Item 23.13(From Mod 1):

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

Emission Unit: 0-00705



Process: CLA Source Classification Code: 3-01-033-11

Process Description:

Clay handling system. Inert clays and wetting agents are blended as a diluent for product. Emissions are directed to a fabric filter dust collector.

Emission Source/Control: 00705 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0A705 - Process

Item 23.14(From Mod 1):

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

Emission Unit: 0-00711

Process: PAC Source Classification Code: 3-01-033-11

Process Description:

Form fill and seal packaging ventilation system. Powders (formulated material) are dumped into a hopper and packaged into small (1 oz-1 lb) packages. The dust from the hopper is captured by a primary and secondary baghouse followed by carbon filters. There is also a model 3CF Glide Pack carbon filter.

Emission Source/Control: 00710 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00711 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0B711 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0A711 - Process

Item 23.15(From Mod 1):

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

Emission Unit: 0-00741

Process: AIR Source Classification Code: 5-04-104-09

Process Description:

Five tray low profile air stripper to remove methylene chloride, benzene and other organic compounds from groundwater and breakpoint chlorination process to convert ammonia to nitrogen. Water from the ten extraction wells is collected into the air stripper influent tank.

Emission Source/Control: 00741 - Process

Item 23.16(From Mod 1):

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

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Emission Unit: 0-00741

Process: LIM

Process Description:

Lime is dumped into hopper at water treatment system.
lime dust is collected by baghouse. baghouse model Dracco
MBII 32 fabric collector. Approximately 400 lbs of lime
per day is used when treating water.

Emission Source/Control: 00801 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0A801 - Process

Item 23.17(From Mod 1):

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

Emission Unit: 0-02314

Process: CAD

Source Classification Code: 3-01-033-11

Process Description:

Cadusatos liquid formulation and packaging.
Microencapsulation of Cadusatos insecticide. Dry raw
materials are filtered through fabric filter. Liquid raw
materials are filtered through fabric filter. Liquid raw
materials are filtered through carbon vent-sorb filters.

Emission Source/Control: 02314 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: B2314 - Control

Control Type: FABRIC FILTER

Emission Source/Control: C2314 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: D2314 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: A2314 - Process

