



Facility Identification Data

Name: WYETH PHARMACEUTICALS
Address: 401 N MIDDLETOWN RD
PEARL RIVER, NY 10965-1299

Owner/Firm

Name: WYETH HOLDINGS CORP
Address: 401 NORTH MIDDLETOWN RD
PEARL RIVER, NY 10965, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: KENNETH R GRZYB
Address: NYSDEC REGION 3
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561
Phone:8452563048

Division of Air Resources:
Name: GEORGE A SWEIKERT
Address: 21 SOUTH PUTT CORNERS RD
NEW PALTZ, NY 12561-1696
Phone:8452563185

Air Permitting Contact:
Name: ERIC NELSON
Address: WYETH PHARMACEUTICALS
401 N MIDDLETOWN RD
PEARL RIVER, NY 10965
Phone:8456023870

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

APPLICATION FOR RENEWAL OF AIR TITLE V FACILITY.

Attainment Status

WYETH PHARMACEUTICALS is located in the town of ORANGETOWN in the county of ROCKLAND. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)



Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

THIS FACILITY IS ENGAGED IN THE MANUFACTURE, RESEARCH AND DEVELOPMENT OF PHARMACEUTICAL, NUTRITIONAL, BIOLOGICAL AND OTHER RELATED PRODUCTS. THE LOCATION ALSO CONTAINS FACILITY SUPPORT FUNCTIONS SUCH AS WAREHOUSES, TANKS, WASTEWATER TREATMENT AND BOILERS

Permit Structure and Description of Operations

The Title V permit for WYETH PHARMACEUTICALS

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices



process - any device or contrivance which may emit air contaminants that is not included in the above categories.

WYETH PHARMACEUTICALS is defined by the following emission unit(s):

Emission unit F00001 - BOILER #4 FUEL TYPE IS NATURAL GAS AND NO. 2 OIL.

Emission unit F00001 is associated with the following emission points (EP):

13256

It is further defined by the following process(es):

Process: B01BOILER #4 FIRING NATURAL GAS AND/OR #2 FUEL OIL.

Emission unit F00002 - CO-GENERATION FACILITY CONSISTING OF TWO TURBINES (#1 AND 2) EACH WITH A BOILER (BOILERS #1 AND #2). DURING PERIODS OF START-UP, THE TURBINE(S) EXHAUST THROUGH A BYPASS STACK UNTIL THE UNIT REACHES 90% RUNNING SPEED (BOILER PERMISSIVE) AT WHICH TIME THE TURBINE EXHAUST IS DIVERTED INTO THE BOILER(S) AFTER THE AIR PURGE THROUGH THE BOILERS IS COMPLETED. THE WATER FOR INJECTION TURNS ON AUTOMATICALLY AT PRE-SET T5 TEMPERATURE OF 1100 DEG. F. THE TURBINE(S) ARE RAMPED UP TO, AND THEN OPERATED AT THE KW CONTROL SETPOINT, LIMITED BY THE T5 MAXIMUM SETTING OF 1275 DEG. F. T5 IS THE TURBINE THIRD STAGE INLET (POWER TURBINE INLET) TEMPERATURE. DURING SHUT-DOWN, THE BOILER STEAM LOAD IS SHED BY GRADUALLY REDUCING AND THEN SHUTTING OFF FUEL TO THE DUCT BURNERS (IF IN USE) AND THEN DIVERTING TURBINE EXHAUST THROUGH THE BYPASS STACK. UPON ACTIVATING A NORMAL STOP, THE TURBINE FUEL FLOW IS GRADUALLY REDUCED AS THE UNIT RAMPS DOWN FROM FULL POWER TO ZERO POWER OUTPUT. THE WATER FOR INJECTION TURNS OFF AUTOMATICALLY WHEN THE PRE-SET T5 TEMPERATURE OF 1050 DEG F. IS REACHED. THE FUEL FLOW TO THE TURBINE CONTINUES THROUGHOUT THE COOL-DOWN PERIOD AND THEN SHUTS OFF, SHUTTING DOWN THE TURBINE. IN THE EVENT OF TURBINE FAILURE, THE BOILERS CAN BE FIRED INDEPENDENTLY TO MAINTAIN A STEAM SUPPLY TO THE FACILITY. THIS FRESH AIR FIRING OF THE BOILERS WOULD BE A NON-ROUTINE EVENT RESERVED FOR EMERGENCIES.

Emission unit F00002 is associated with the following emission points (EP):

00101, 00102, 00106, 00107

It is further defined by the following process(es):

Process: C01OPERATION OF TURBINE(S) ON NATURAL GAS, AND WASTE HEAT BOILERS WITH DUCT BURNERS OFF, AS DESCRIBED IN THE UNIT DESCRIPTION.

Process: C02OPERATION OF TURBINES AND WASTE HEAT BOILER(S) ON NATURAL GAS, AS DESCRIBED IN THE UNIT DESCRIPTION. DURING TESTING FOR FUEL CHANGE-OVER PERIODS, WHEN THE UNIT IS CHANGING FROM BURNING NATURAL GAS TO FUEL OIL, THE TURBINE AND DUCT BURNERS MAY BE OPERATED ON DIFFERENT FUELS.

Process: C03OPERATION OF TURBINE(S) ON #2 FUEL OIL, AND WASTE HEAT BOILERS WITH DUCT BURNERS OFF, AS DESCRIBED IN THE UNIT DESCRIPTION.

Process: C04OPERATION OF TURBINE(S) AND WASTE HEAT BOILER(S) ON #2 FUEL OIL, AS DESCRIBED IN THE UNIT DESCRIPTION.

Process: C05FRESH AIR FIRING

Process: C06FRESH AIR FIRING

Emission unit F00003 - THIS UNIT INCLUDES EQUIPMENT ASSOCIATED WITH THE SITE INFRASTRUCTURE INCLUDING THE WASTE WATER TREATMENT PLANT, FUEL STORAGE AND EMERGENCY GENERATORS.

Emission unit F00003 is associated with the following emission points (EP):

09714, 09715, 14109, 14114, 14116, 54118, FO111, FO112

It is further defined by the following process(es):

Process: W01EQUIPMENT ASSOCIATED WITH THE WASTE WATER TREATMENT PLANT.

Process: W02FUEL OIL TANKS. FUEL OIL TANKS.

Process: W03TWO EMERGENCY GENERATORS OPERATED ON DIESEL FUEL. FUEL BURNED IS



CAPPED SO THAT ANNUAL NOX EMISSIONS REMAIN BELOW 5000 POUNDS PER YEAR. TWO EMERGENCY GENERATORS OPERATED ON DIESEL FUEL. FUEL BURNED IS CAPPED SO THAT ANNUAL NOX EMISSIONS REMAIN BELOW 5000 POUNDS PER YEAR.

Emission unit F00004 - BOILER #5 FUEL TYPE IS NATURAL GAS AND NO. 2 OIL

Emission unit F00004 is associated with the following emission points (EP):

23155

It is further defined by the following process(es):

Process: B02BOILER #5 FIRING NATURAL GAS AND/OR #2 FUEL OIL.

Emission unit F00005 - BOILER #3 FUEL TYPE IS NATURAL GAS AND NO. 2 OIL.

Emission unit F00005 is associated with the following emission points (EP):

02359

It is further defined by the following process(es):

Process: B04BOILER #3 FIRING NATURAL GAS AND/OR #2 FUEL OIL.

Emission unit P00001 - PHARMACEUTICAL MANUFACTURING FORMULATION OPERATIONS INCLUDING WEIGHING, MILLING, BLENDING, GRANULATION, DRYING, FILLING AND PACKAGING OPERATIONS.

Emission unit P00001 is associated with the following emission points (EP):

11246, 11253, 11254, 11256, 11257, 11258, 12009, 12010, 12051, 12055, 12073, 12099, 21207, 21234, 21237, 21240, 21241, 21244, 21251, 21252, 32018, 32019, 32022, 32023, 33074, 33075, 33076

It is further defined by the following process(es):

Process: 045PARTICULATE SOURCE/EXHAUST SYSTEMS THAT MAY EMIT A, B, C AND D RATED AIR CONTAMINANTS.

Emission unit R00002 - MANUFACTURING IN RESEARCH & DEVELOPMENT FACILITIES. MANY OF THESE SOURCES WILL ALSO OPERATE AS EXEMPT R&D SOURCES. OPERATIONS ARE SUBJECT TO THE PERMIT AND APPLICABLE RULE ONLY WHEN MANUFACTURING PRODUCTS FOR SALE OR WHEN USING/EMITTING VOCs WHEN MANUFACTURING PRODUCTS FOR CLINICAL USE IN PATIENTS AND NOT OTHERWISE EXEMPT FROM PART 233 (E.G. 233.1(G)(2)).

Emission unit R00002 is associated with the following emission points (EP):

24010, 24011, 24012, 24013, 24014

It is further defined by the following process(es):

Process: R02PRODUCTION EXHAUST SYSTEMS USED IN THE MANUFACTURING OF PHARMACEUTICAL PRODUCTS FOR CLINICAL USE IN PATIENTS AND EMITTING 33 POUND PER DAY VOC OR LESS. THE SOURCES MAY ALSO OPERATE AS EXEMPT R&D SOURCES.

Emission unit R00003 - FORMULATION DEVELOPMENT OPERATIONS IN BUILDING 230. VOC EMISSIONS ARE CAPPED AT 0.21 TONS PER YEAR. BOTH AQUEOUS BASED AND SOLVENT BASED DEVELOPMENT ACTIVITIES MAY BE PERFORMED. OCCASIONALLY, PHARMACEUTICAL PRODUCTS MAY BE MANUFACTURED FOR USE IN PATIENTS FOR CLINICAL STUDY. FOR ALL OPERATIONS, THE VOC CONTROL SYSTEM MAY BE BY-PASSED, EXCEPT WHEN THE BATCH VOC EMISSION RATE FOR THE PROCESS EQUIPMENT EXCEEDS ONE POUND PER DAY, OR WHEN VOC EMISSIONS IN ANY CALENDAR DAY EXCEED ONE POUND. THE VOC CONTROL SYSTEM IS NOT OPERATED WHEN VOCs ARE NOT PROCESSED.

Emission unit R00003 is associated with the following emission points (EP):

63005, 63006, 63010, 63011, 63012, 63013, 63016, 63020, 63032

It is further defined by the following process(es):

Process: R01FORMULATION DEVELOPMENT OPERATIONS IN BUILDING 230. VOC EMISSIONS ARE CAPPED AT 0.21 TONS PER YEAR. BOTH AQUEOUS BASED AND SOLVENT BASED DEVELOPMENT ACTIVITIES MAY BE PERFORMED. OCCASIONALLY, PHARMACEUTICAL PRODUCTS MAY BE MANUFACTURED FOR USE IN PATIENTS FOR CLINICAL STUDY. FOR ALL OPERATIONS, THE VOC



CONTROL SYSTEM MAYA BE BY-PASSED, EXXCEPT WHEN THE BATCH VOC EMISSION RATE FOR THE PROCESS EQUIPMENT EXCEEDS ONE POUND PER DAY, OR WHEN VOC EMISSIONS IN ANY CALENDAR DAY EXCEED ONE POUND. THE VOC CONTR OL SYSTEM IS NOT OPERATED WHEN VOC'S ARE NOT PROCESSED.

Emission unit W00002 - PHARMACEUTICAL MANUFACTURING OF BIOLOGICAL PRODUCTS INCLUDING VACCINES.

Emission unit W00002 is associated with the following emission points (EP):

05443, 05444, 21103, 21104, 21107, 21108, 21110, 21113, 21157, 21538, 21540, 21544, 21548, 36241

It is further defined by the following process(es):

Process: 070PARTICULATE SOURCES/EXHAUST SYSTEMS WITH PARTICULATE CONTROLS.

Process: 072PHARM. MFG PRODUCTION EXHAUST SYSTEMS W/NON VOC EMISSIONS.

Process: 074PROCESS TANKS AND OTHER EQUIPMENT WITH NON-VOC EMISSIONS.

Emission unit R00005 - PHARMACEUTICAL MANUFACTURING IN RESEARCH AND DEVELOPMENT FACILITIES. MANY OF THESE SOURCES WILL ALSO OPERATE AS EXEMPT R&D SOURCES. OPERATIONS ARE SUBJECT TO THE PERMIT AND APPLICABLE RULE ONLY WHEN MANUFACTURING PRODUCTS FOR SALE OR WHEN USING/EMITTING VOC'S WHEN MANUFACTURING PRODUCTS FOR CLINICAL USE IN PATIENTS AND NOT OTHERWISE EXEMPT FROM PART 233 (E.G. 233.1(G) (2)).

Emission unit R00005 is associated with the following emission points (EP):

25006

It is further defined by the following process(es):

Process: R08PHARMACEUTICAL MANUFACTURING EXEMPT DISTILLATION OPERATIONS AND/OR VACUUM DRYER SOURCES MAY BE USED FOR COMMERCIAL PRODUCTION, PRODUCTION FOR CLINICAL STUDIES OR EXEMPT R&D. VOC EMISSION RATE POTENTIAL LESS THAN 15 POUNDS PER DAY.

Process: R09PHARMACEUTICAL MANUFACTURING CENTRIGUES CONTAINING VOC'S AND FILTERS WITH EXPOSED LIQUID SURFACE WHERE THE LIQUID CONTAINES VOLATILE ORGANIC COMPOUNDS (VOC'S) AND EXERTS A TOTAL VAPOR PRESSURE OF 0.5 PSI OR MORE AT 20 DEG C. MAY ALSO OPERATE AS EXEMPT R& D SOURCES.

Process: R10PHARM. MANUFACTURING VOC PROCESS TANKS. SOURCES MAY BE USED FOR COMMERCIAL PRODUCTION, PRODUCTION FOR CLINICAL STUDIES OR EXEMPT R&D.

Process: R11PHARM. MANUFACTURING PRODUCTION EXHAUST SYSTEMS WITH VOC EMISSIONS THAT ARE LESS THAN 33 LBS/DAY. SOURCES MAY ALSO OPERATE AS EXEMPT R&D SOURCES.

Process: R12AQUEOUS BASED PHARMACEUTICAL MANUFACTURING FOR SALE. ALSO INCLUDES PHARMACEUTICAL MANUFACTURING FOR SALE WHERE SMALL QUANTITIES OF VOC'S (LESS THAN ONE POUND PER DAY) MAY BE EMITTED. SOURCES MAY ALSO OPERATE AS EXEMPT R&D SOURCES.

Process: R13Commercial production of Pharmaceutical products or intermediates with non-A rated, non-voc emissions.

Process: R14Commercial production of Pharmaceutical products or intermediates with non-A rated VOC and non-VOC emissions. Emission rate potetntial less than 10 lbs/hour non-VOC, less than or equal to 15 lbs/day VOC from equipment and <33 lbs/day other VOC.

Title V/Major Source Status

WYETH PHARMACEUTICALS is subject to Title V requirements. This determination is based on the following information:

Facility is Major for Carbon Monoxide, Oxides of Nitrogen and Volatile organic Compounds.

Program Applicability



The following chart summarizes the applicability of WYETH PHARMACEUTICALS with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	YES
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific



stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

2833	MEDICINALS AND BOTANICALS
2834	PHARMACEUTICAL PREPARATIONS
2836	BIOLOGICAL PRODUCTS, EXCEPT DIAGNOSTIC
9999	NONCLASSIFIABLE ESTABLISHMENTS

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code

Description



Permit Review Report

Permit ID: 3-3924-00025/00821

Renewal Number: 1

07/01/2008

3-01-060-08	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS Exhaust Systems
3-01-060-99	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS Other Not Classified
3-01-820-02	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - WASTEWATER AGGREGATE WASTEWATER TREATMENT
1-02-014-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - CO BOILER Distillate Oil
2-01-001-01	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Turbine
2-02-001-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL(DIESEL) Reciprocating
2-02-004-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION LARGE BORE ENGINE Dual Fuel (Oil/Gas)
3-15-030-01	PHOTOGRAPHIC EQUIPMENT MISCELLANEOUS INDUSTRIES - PHOTOGRAPHIC EQUIPMENT- LABORATORIES MISCELLANEOUS INDUSTRIES-LABORATORIES-BENCH SCALE REAGENTS-RESEARCH

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr pteyear	Range Y
000092-52-4	1, 1 BIPHENYL	pteyear	Y
000079-34-5	1,1,2,2-TETRACHLOROETHANE	pteyear	Y
000057-14-7	1,1-DIMETHYL HYDRAZINE	pteyear	Y
000120-82-1	1,2,4-TRICHLOROBENZENE	pteyear	Y
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER	pteyear	Y
000120-80-9	1,2-BENZENEDIOL	pteyear	Y
000107-06-2	1,2-DICHLOROETHANE	pteyear	Y
000107-21-1	1,2-ETHANEDIOL	pteyear	Y
000108-38-3	1,3 DIMETHYL BENZENE	pteyear	Y
000095-80-7	1,3-BENZENEDIAMINE, 4-METHYL-	pteyear	Y
000106-99-0	1,3-BUTADIENE	pteyear	Y



Permit Review Report

Permit ID: 3-3924-00025/00821

Renewal Number: 1

07/01/2008

000126-99-8	1,3-BUTADIENE, 2-CHLORO-	pteyear	Y	
000085-44-9	1,3-ISOBENZOFURANDIONE	pteyear	Y	
000123-31-9	1,4-BENZENEDIOL	pteyear	Y	
000123-91-1	1,4-DIETHYLENE DIOXIDE	pteyear	Y	
000063-25-2	1-NAPHTHALENOL, METHYLCARBAMATE	pteyear		Y
000098-86-2	1-PHENYLETHANONE	pteyear	Y	
000542-75-6	1-PROPENE, 1,3-DICHLORO-	pteyear	Y	
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN	pteyear		Y
000121-14-2	2,4, DINITRO TOLUENE	pteyear	Y	
000051-28-5	2,4, DINITROPHENOL	pteyear	Y	
000088-06-2	2,4,6 TRICHLOROPHENOL	pteyear	Y	
000094-75-7	2,4-DICHLOROPHENOXYACETIC ACID	pteyear		Y
000108-31-6	2,5 - FURANDIONE	pteyear	Y	
000053-96-3	2-ACETYLAMINOFLUORENE	pteyear	Y	
000078-59-1	2-CYCLOHEXEN-1-ONE,3,5,5-TRIMETHYL	pteyear		Y
000105-60-2	2H-AZEPIN-2-ONE,HEXAHYDRO	pteyear		A
000079-10-7	2-PROPENOIC ACID	pteyear	Y	
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	pteyear		Y
000091-94-1	3,3'-DICHLOROBENZIDINE	pteyear	Y	
000119-90-4	3,3'-DIMETHOXYBENZIDINE	pteyear	Y	
000107-05-1	3-CHLORO-1-PROPENE	pteyear	Y	
000101-77-9	4,4'-DIAMINODIPHENYLMETHANE	pteyear		Y
000060-11-7	4-DIMETHYLAMINOAZOBENZENE	pteyear		Y
000092-93-3	4-NITROBIPHENYL	pteyear	Y	
000075-07-0	ACETALDEHYDE	pteyear	Y	
000060-35-5	ACETAMIDE	pteyear	Y	
000108-05-4	ACETIC ACID ETHENYL ESTER	pteyear		Y
000079-11-8	ACETIC ACID, CHLORO	pteyear	Y	
000075-05-8	ACETONITRILE	pteyear	Y	
000532-27-4	ALPHA-CHLOROACETOPHENONE	pteyear		Y
000062-53-3	ANILINE	pteyear	Y	
007440-36-0	ANTIMONY	pteyear	Y	
007440-38-2	ARSENIC	pteyear	Y	
001332-21-4	ASBESTOS	pteyear	Y	
000075-55-8	AZIRIDINE, 2-METHYL	pteyear	Y	
000114-26-1	BAYGON	pteyear	Y	
000090-04-0	BENZENAMINE, 2-METHOXY	pteyear	Y	
000095-53-4	BENZENAMINE, 2-METHYL	pteyear	Y	
000121-69-7	BENZENAMINE, N, N-DIMETHYL	pteyear		Y
000071-43-2	BENZENE	pteyear	Y	
000098-82-8	BENZENE, (1-METHYLETHYL)	pteyear	Y	
000106-46-7	BENZENE, 1,4-DICHLORO-	pteyear	Y	
000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-	pteyear		Y
000098-07-7	BENZENE, TRICHLOROMETHYL	pteyear		Y
000095-47-6	BENZENE,1,2-DIMETHYL	pteyear	Y	
000092-87-5	BENZIDINE	pteyear	Y	
000100-44-7	BENZYL CHLORIDE	pteyear	Y	
007440-41-7	BERYLLIUM	pteyear	Y	
000057-57-8	BETA-PROPIOLACTONE	pteyear	Y	
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE	pteyear		Y
000075-25-2	BROMOFORM	pteyear	Y	
007440-43-9	CADMIUM	pteyear	Y	
000133-06-2	CAPTAN	pteyear	Y	
000051-79-6	CARBAMIC ACID, ETHY ESTER	pteyear		Y
000079-44-7	CARBAMIC CHLORIDE, DIMETHYL	pteyear		Y
000075-15-0	CARBON DISULFIDE	pteyear	Y	
000630-08-0	CARBON MONOXIDE	pteyear	G	
000463-58-1	CARBONYL SULFIDE	pteyear	Y	
000133-90-4	CHLORAMBEN	pteyear	Y	
000057-74-9	CHLORDANE	pteyear	Y	
007782-50-5	CHLORINE	pteyear	Y	
000108-90-7	CHLOROBENZENE	pteyear	Y	
000075-45-6	CHLORODIFLUORO-METHANE	pteyear		B
000067-66-3	CHLOROFORM	pteyear	Y	
007440-47-3	CHROMIUM	pteyear	Y	



Permit Review Report

Permit ID: 3-3924-00025/00821

Renewal Number: 1

07/01/2008

007440-48-4	COBALT	pteyear		Y	
001319-77-3	CRESYLIC ACID	pteyear		Y	
000156-62-7	CYANAMIDE, CALCIUM SALT (1:1)	pteyear	pteyear		Y
000057-12-5	CYANIDE	pteyear		Y	
003547-04-4	DDE	pteyear		Y	
000334-88-3	DIAZOMETHANE	pteyear		Y	
000132-64-9	DIBENZOFURAN	pteyear		Y	
000075-71-8	DICHLORODIFLUOROMETHANE	pteyear	pteyear		B
000075-09-2	DICHLOROMETHANE	pteyear		Y	
000131-11-3	DIMETHYL PHTHALATE	pteyear		Y	
000071-55-6	ETHANE, 1,1,1-TRICHLORO	pteyear		Y	
000079-00-5	ETHANE, 1,1,2-TRICHLORO	pteyear		Y	
000075-34-3	ETHANE, 1,1-DICHLORO-	pteyear		Y	
000111-44-4	ETHANE, 1,1'-OXYBIS 2-CHLORO	pteyear	pteyear		Y
000106-93-4	ETHANE, 1,2-DIBROMO	pteyear		Y	
000306-83-2	ETHANE, 2,2-DICHLORO-1,1-TRIFLUORO-	pteyear	pteyear		A
000075-00-3	ETHANE, CHLORO	pteyear		Y	
000067-72-1	ETHANE, HEXACHLORO	pteyear		Y	
000111-42-2	ETHANOL, 2,2'-IMINOBIS-	pteyear		Y	
000111-46-6	ETHANOL, 2,2'-OXYBIS-	pteyear		A	
000075-35-4	ETHENE, 1,1-DICHLORO	pteyear		Y	
000510-15-6	ETHYL 4,4'-DICHLOROBENZILATE	pteyear	pteyear		Y
000106-88-7	ETHYL OXIRANE	pteyear		Y	
000100-41-4	ETHYLBENZENE	pteyear		Y	
000079-06-1	ETHYLENE CARBOXAMIDE	pteyear		Y	
000075-21-8	ETHYLENE OXIDE	pteyear		Y	
000096-45-7	ETHYLENE THIOUREA	pteyear		Y	
000151-56-4	ETHYLENEIMINE	pteyear		Y	
000050-00-0	FORMALDEHYDE	pteyear		Y	
000068-12-2	FORMAMIDE, N,N-DIMETHYL	pteyear		Y	
0NY100-00-0	HAP	pteyear		C	
000076-44-8	HEPTACHLOR	pteyear		Y	
000118-74-1	HEXACHLOROBENZENE	pteyear		Y	
000087-68-3	HEXACHLOROBUTADIENE	pteyear		Y	
000077-47-4	HEXACHLOROCYCLOPENTADIENE	pteyear	pteyear		Y
000110-54-3	HEXANE	pteyear		Y	
000822-06-0	HEXANE, 1,6-DIISOCYANATO-	pteyear		Y	
000302-01-2	HYDRAZINE	pteyear		Y	
007647-01-0	HYDROGEN CHLORIDE	pteyear		Y	
007664-39-3	HYDROGEN FLUORIDE	pteyear		Y	
000122-66-7	HYRAZINE, 1,2 - DIPHENYL	pteyear		Y	
007439-92-1	LEAD	pteyear		Y	
000058-89-9	LINDANE, GAMMA	pteyear		Y	
007439-96-5	MANGANESE	pteyear		Y	
007439-97-6	MERCURY	pteyear		Y	
000062-75-9	METHANAMINE, N-METHYL-N-NITROSO	pteyear	pteyear		Y
000075-63-8	METHANE, BROMOTRIFLUORO- CBRF3	pteyear	pteyear		B
000542-88-1	METHANE, OXYBIS (CHLORO)	pteyear		Y	
000075-69-4	METHANE, TRICHLOROFLUORO-	pteyear	pteyear		B
000072-43-5	METHOXYCHLOR	pteyear		Y	
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER	pteyear	pteyear		Y
000067-56-1	METHYL ALCOHOL	pteyear		Y	
000074-83-9	METHYL BROMIDE	pteyear		Y	
000074-87-3	METHYL CHLORIDE	pteyear		Y	
000107-30-2	METHYL CHLOROMETHYLETHER	pteyear	pteyear		Y
000078-93-3	METHYL ETHYL KETONE	pteyear		A	
000060-34-4	METHYL HYDRAZINE	pteyear		Y	
000074-88-4	METHYL IODIDE	pteyear		Y	
000624-83-9	METHYL ISOCYANATE	pteyear		Y	
001634-04-4	METHYL TERTBUTYL ETHER	pteyear	pteyear		Y
000101-68-8	METHYLENE BISPHENYL ISOCYANATE	pteyear	pteyear		Y
000121-44-8	N,N-DIETHYL ETHANAMINE	pteyear		Y	
000091-20-3	NAPHTHALENE	pteyear		Y	
0NY059-28-0	NICKEL (NI 059)	pteyear		Y	
000098-95-3	NITROBENZENE	pteyear		Y	



Permit Review Report

Permit ID: 3-3924-00025/00821

Renewal Number: 1

07/01/2008

000059-89-2	NITROSOMORPHOLINE	pteyear		Y
000684-93-5	NITROSO-N-METHYLUREA	pteyear		Y
000119-93-7	O-TOLIDINE	pteyear		Y
0NY210-00-0	OXIDES OF NITROGEN	pteyear		H
000106-89-8	OXIRANE, (CHLOROMETHYL)	pteyear		Y
000092-67-1	P-AMINODIPHENYL	pteyear		Y
000100-02-7	PARA-NITROPHENOL	pteyear		Y
0NY075-00-0	PARTICULATES	pteyear		H
000082-68-8	PENTACHLORONITROBENZENE	pteyear		Y
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-	pteyear		Y
000127-18-4	PERCHLOROETHYLENE	pteyear		Y
000108-95-2	PHENOL	pteyear		Y
000534-52-1	PHENOL, 2-METHYL-4,6-DINITRO	pteyear		Y
000108-39-4	PHENOL, 3-METHYL	pteyear		Y
000087-86-5	PHENOL, PENTACHLORO	pteyear		Y
000075-44-5	PHOSGENE	pteyear		Y
007803-51-2	PHOSPHINE	pteyear		Y
000062-73-7	PHOSPHORIC ACID, 2,2-DICHLOROETHENYL DIMETHYL ESTER			pteyear
Y				
000680-31-9	PHOSPHORIC TRIAMIDE, HEXAMETHYL	pteyear		Y
000056-38-2	PHOSPHOROTHIOIC ACID, O,O-DIETHYL O-(4-NITROPHENYL) ESTER			pteyear
Y				
007723-14-0	PHOSPHORUS (YELLOW)	pteyear		Y
0NY075-00-5	PM-10	pteyear		H
001336-36-3	POLYCHLORINATED BIPHENYL	pteyear		Y
000106-50-3	P-PHENYLENEDIAMINE	pteyear		Y
001120-71-4	PROPANE SULTONE	pteyear		Y
000096-12-8	PROPANE, 1,2-DIBROMO-3-CHLORO	pteyear		Y
000078-87-5	PROPANE, 1,2-DICHLORO	pteyear		Y
000075-56-9	PROPANE, 1,2-EPOXY-	pteyear		Y
000079-46-9	PROPANE, 2-NITRO	pteyear		Y
000107-13-1	PROPENENITRILE	pteyear		Y
000123-38-6	PROPIONALDEHYDE	pteyear		Y
000091-22-5	QUINOLINE	pteyear		Y
000106-51-4	QUINONE	pteyear		Y
007782-49-2	SELENIUM	pteyear		Y
000100-42-5	STYRENE	pteyear		Y
000096-09-3	STYRENE OXIDE	pteyear		Y
007446-09-5	SULFUR DIOXIDE	pteyear		F
000064-67-5	SULFURIC ACID, DIETHYL ESTER	pteyear		Y
000077-78-1	SULFURIC ACID, DIMETHYL ESTER	pteyear		Y
007550-45-0	TITANIUM TETRACHLORIDE	pteyear		Y
000108-88-3	TOLUENE	pteyear		Y
008001-35-2	TOXAPHENE	pteyear		Y
000079-01-6	TRICHLOROETHYLENE	pteyear		Y
000095-95-4	TRICHLOROPHENOL, 2,4,5	pteyear		Y
001582-09-8	TRIFLURALIN	pteyear		Y
000593-60-2	VINYL BROMIDE	pteyear		Y
000075-01-4	VINYL CHLORIDE	pteyear		Y
0NY998-00-0	VOC	pteyear		H
001330-20-7	XYLENE, M, O & P MIXT.	pteyear		Y
000106-42-3	XYLENE, PARA-	pteyear		Y

New York State Department of Environmental Conservation



Permit ID: 3-3924-00025/00821

Permit Review Report
Renewal Number: 1

07/01/2008

New York State Department of Environmental Conservation



Permit ID: 3-3924-00025/00821

Permit Review Report
Renewal Number: 1

07/01/2008



NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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 - 6NYCRR Part 201-6.5(a)(5)

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY		58	Powers and Duties of the Department with respect to air pollution control



Permit Review Report

Permit ID: 3-3924-00025/00821

Renewal Number: 1

07/01/2008

F-00002	40CFR 52-A.21	39, 40	Prevention of Significant Deterioration
F-00002/-/C01	40CFR 52-A.21	43, 44	Prevention of Significant Deterioration
F-00002/-/C02	40CFR 52-A.21	45, 46	Prevention of Significant Deterioration
F-00002/-/C03	40CFR 52-A.21	47, 48	Prevention of Significant Deterioration
F-00002/-/C04	40CFR 52-A.21	49, 50	Prevention of Significant Deterioration
F-00002	40CFR 60-A	41	
F-00002	40CFR 60-GG.334(a)	42	Monitoring of Operations for Turbines Employing Water Injection to Control NOx
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
FACILITY	6NYCRR 201-1.4	59	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 29, 30	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	
FACILITY	6NYCRR 201-6.5(a)(7)	2	
FACILITY	6NYCRR 201-6.5(a)(8)	16	
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	17	
FACILITY	6NYCRR 201-6.5(e)	6	
FACILITY	6NYCRR 201-6.5(f)	24	
FACILITY	6NYCRR 201-6.5(f)(6)	18	
FACILITY	6NYCRR 201-7	31	Federally Enforceable Emissions Caps
F-00002	6NYCRR 201-7	34	Federally Enforceable Emissions Caps
R-00003	6NYCRR 201-7	57	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	60	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions -



Permit Review Report

Permit ID: 3-3924-00025/00821

Renewal Number: 1

07/01/2008

			visible emissions limited
FACILITY P-00001	6NYCRR 212.11 (b) 6NYCRR 212.4 (c)	26 53	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6 (a)	25	General Process Emission Sources - opacity of emissions limited
FACILITY FACILITY	6NYCRR 215 6NYCRR 225-1.2 (a) (2)	9 27	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY F-00001	6NYCRR 226.2 6NYCRR 227-1.3 (a)	28 32	Smoke Emission Limitations.
F-00001	6NYCRR 227-2.4 (b) (1)	33	Control Requirements for large boilers which are not case by case.
F-00005	6NYCRR 227-2.4 (c) (2)	51, 52	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
F-00002	6NYCRR 231-2	34	New Source Review in Nonattainment Areas and Ozone Transport Region
R-00003	6NYCRR 231-2	57	New Source Review in Nonattainment Areas and Ozone Transport Region
F-00002 R-00002	6NYCRR 231-2.2 (b) 6NYCRR 233.3 (f)	35, 36, 37, 38 54	In-process tank requirements
R-00002 R-00002	6NYCRR 233.3 (g) 6NYCRR 233.5	55 56	

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.



6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.



6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.



6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, WYETH PHARMACEUTICALS has been determined to be subject to the following regulations:

40CFR 52-A.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .



40CFR 60-A

This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

40CFR 60-GG.334 (a)

This regulation requires the owner or operator of any stationary gas turbine subject to the provisions of 40CFR60 Subpart GG that is using water injection to control NOx emissions to install and operate a continuous monitoring system to monitor and record fuel consumption and the ratio of water to fuel fired in the turbine

6NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6NYCRR 212 .11 (b)

control requirements

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 226 .2

degreasing requirements.

6NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-2.4 (b) (1)

This paragraph provides a table for gas only, gas and/or oil firing capable, pulverized coal, and overfeed stoker emission limits. Compliance is determined by a stack test.

6NYCRR 227-2.4 (c) (2)

This regulation requires mid-size boilers (fuel combustion units with a maximum heat input capacity greater than 50 million Btu per hour and equal to or less than 100 million Btu per hour that produce steam or heats water or any other heat transfer medium) to meet the following emission limits (listed in pounds NOx per million Btu) by May 31, 1985:

for Gas fuel -	0.10
for Distillate Oil -	0.12
for Residual Oil -	0.30

Compliance with these emission limits are determined with a 1-hour average in accordance with section



227-2.6(a)(4). If CEMs are used to determine compliance, the requirements of 227-2.6(b) apply, including the use of a 24-hour averaging period.

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

6NYCRR 231-2.2 (b)

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the requirements set forth in the other sections of the rule. Under subsection (b) of the section, facilities located in the severe ozone non-attainment area have an option regarding the level of pollution controls provided that certain requirements are met.

6NYCRR 233 .3 (f)

This condition reduces the emissions of volatile organic compounds (VOC's) by requiring that all in-process tanks containing VOC's have covers on the openings except when an operator needs to access the inside of them.

6NYCRR 233 .3 (g)

This condition reduces the emissions of volatile organic compounds (VOC's) by requiring the facility to repair all liquid leaks containing VOC's no later than 15 days after discovering the leak. The facility is allowed to wait until the process is shut down if it is impossible to fix it otherwise.

6NYCRR 233 .5

This section lists the records that a facility subject to the Pharmaceutical and Cosmetic Manufacturing Processes rule (6NYCRR, Part 233) must keep in order to prove that the rule is continuously being complied with. These records include the vapor pressures of the volatile organic compounds used in the process(es), certain parameters of any control device employed to reduce VOC emissions, and information regarding any leaks that were found in any of the process equipment. All records must be kept for at least five years.

Compliance Certification

Summary of monitoring activities at WYETH PHARMACEUTICALS:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
F-00002	39	intermittent emission testing
F-00002	40	intermittent emission testing
F-00002/-/C01	43	intermittent emission testing
F-00002/-/C01	44	continuous emission monitoring (cem)
F-00002/-/C02	45	intermittent emission testing
F-00002/-/C02	46	continuous emission monitoring (cem)
F-00002/-/C03	47	continuous emission monitoring (cem)



Permit Review Report

Permit ID: 3-3924-00025/00821

Renewal Number: 1

07/01/2008

F-00002/-/C03	48	intermittent emission testing
F-00002/-/C04	49	continuous emission monitoring (cem)
F-00002/-/C04	50	intermittent emission testing
F-00002	42	continuous emission monitoring (cem)
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
F-00002	34	continuous emission monitoring (cem)
R-00003	57	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
P-00001	53	intermittent emission testing
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	27	work practice involving specific operations
FACILITY	28	record keeping/maintenance procedures
F-00001	32	monitoring of process or control device parameters as surrogate
F-00001	33	intermittent emission testing
F-00005	51	intermittent emission testing
F-00005	52	intermittent emission testing
F-00002	35	work practice involving specific operations
F-00002	36	monitoring of process or control device parameters as surrogate
F-00002	37	work practice involving specific operations
F-00002	38	monitoring of process or control device parameters as surrogate

Basis for Monitoring

The facility has a PSD permit for Unit F-00002 the Co-Generation facility consisting of two turbines each with a boiler. The PSD Permit contains limits for the following pollutants; CO, Particulates and PM-10. Compliance with these limits are verified through Intermittent Stack Testing done Upon the Request of the Department. Oxides of Nitrogen emitted from Unit F-00002 is regulated under NYCRR Part 231. There are individual limits for the different firing scenarios. NOx is continuously monitored by a CEM System. The Unit F-00002 also has limits on the hours of operation on #2 Fuel Oil and the total number of run hours on #2 Fuel Oil.

Some of the metal parts used in Pharmaceutical manufacturing are cleaned by immersion in solvent, held at room temperature and in closed containers. Although this process (cleaning in metal cans) is akin to cold cleaning degreasing it is far less emission-generating in so far that the typical cold degreasing includes heating the solvent and calls for covers during the time when the process is down. The freeboard condition is intended to minimize emissions induced by the room air turbulence over the opening of a cold degreaser. The metal parts cleaning process in cans inherently meets and exceeds the emission control requirements of 226.3(a)(3).

The coolant temperature of the condensers is measured because the outlet gas flow is not readily measurable due to negligible flow.

New York State Department of Environmental Conservation



Permit ID: 3-3924-00025/00821

Permit Review Report
Renewal Number: 1

07/01/2008