

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 3-3928-00030/00036    Renewal Number: 1**



**05/08/2007**

**Facility Identification Data**

Name: STONY POINT FACILITY  
Address: 70 EAST MAIN ST  
STONY POINT, NY 10980

**Owner/Firm**

Name: UNITED STATES GYPSUM COMPANY  
Address: 125 SOUTH FRANKLIN ST  
CHICAGO, IL 60606-4301, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

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Division of Air Resources:

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Air Permitting Facility Owner Contact:

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STONY POINT, NY 10980-0711  
Phone:8459427000

**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.

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### Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

### Attainment Status

STONY POINT FACILITY is located in the town of STONY POINT 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

The United States Gypsum company, located at Stony Point, NY, operates a gypsum wallboard manufacturing facility. This facility consists of two gypsum board lines, gypsum ore mill operation, packing, specialty and product warehouse. The facility is currently permitted to operate four kettles. rushed and sized gypsum rock is clined in these kettles to create stucco. This renewal includes the replacement of Kettle #2 (Emission Unit UOOOK2) with two new high efficiency kettles, designated kettles #2 North and # 2 South and will remain under the same emission unit.

### Permit Structure and Description of Operations

The Title V permit for STONY POINT FACILITY 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



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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.

STONY POINT FACILITY is defined by the following emission unit(s):

Emission unit USTDST - Calcined gypsum storage warehouse.

Emission unit USTDST is associated with the following emission points (EP):  
00033, 00059

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

Process: ASP is located at FIRST, Building PACKING - Ventilation of air from stucco handling system.

Process: SDP is located at FIRST, Building MILL - Ventilation of displaced air from stucco entering 900 ton bin.

Emission unit U00DUN - Fugitive dust collection fro dunnage machine and cutback saw.

Emission unit U00DUN is associated with the following emission points (EP):  
00093

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

Process: SAW is located at FIRST, Building BOARD - Sawing and stacking of dunnage packs for separation of gypsum wallboard units.

Emission unit U0BSNV - This unit consists of three emission points for vermiculite, starch, and unloading process.

Emission unit U0BSNV is associated with the following emission points (EP):  
00062, 00063, 00064

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

Process: REC is located at FIRST, Building BOARD - Venting of conveying air for unloading receiver.

Process: STR is located at FIRST, Building BOARD - Venting of conveying air for starch bin.

Process: VER is located at FIRST, Building BOARD - Venting of conveying air for vermiculite bin.

Emission unit U123LP - No. 1, 2 and 3 landplaster bins.

Emission unit U123LP is associated with the following emission points (EP):

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00050

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

Process: LPX is located at SIXTH, Building MILL - Landplaster conveying system.

Emission unit U1BDDY - Number one (1) board line.

Emission unit U1BDDY is associated with the following emission points (EP):  
00085, 00086, 00087, 00088, 00089, 00092

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

Process: N1A is located at FIRST, Building BOARD - Ventilation of number one (1) board line dry additive conveying system(s).

Process: N1B is located at THIRD, Building BOARD - Number one (1) board line stucco bin.

Process: N1D is located at SECOND, Building BOARD - Ventilation of double grind HRA air conveying system.

Process: N1E is located at SECOND, Building BOARD - Dust collection system for board line finish length saws South.

Process: N1S is located at Building BOARD - Ventilation of number one line starch receiving/dry bin.

Process: N1V is located at SECOND, Building BOARD - Ventilation of number one line vermiculite receiving/day bin.

Emission unit U2BDDY - Number two (2) board line.

Emission unit U2BDDY is associated with the following emission points (EP):  
00070, 00071, 00072, 00073, 00074, 00075, 00076, 00077

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

Process: N2D is located at SECOND, Building BOARD - Ventilation of number two board line double grind HRA system.

Process: N2E is located at SECOND, Building BOARD - Dust collection system for board line finish length saws North.

Process: N2R is located at SECOND, Building BOARD - Ventilation of number two line landplaster storage/receiver bin.

Process: N2S is located at SECOND, Building BOARD - Ventilation of number two line starch receiving/day bin.

Process: N2V is located at SECOND, Building BOARD - Ventilation of number two line vermiculite receiving/day bin.

Emission unit U2STUC - Number two board line calcined gypsum conveying system.

Emission unit U2STUC is associated with the following emission points (EP):  
00094, 00095

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

Process: STC is located at SECOND, Building BOARD - Ventilation of number two board stucco bin and dry additives.

Emission unit UBD1KN - Drying process of wet wallboard for number one production line. It consists of one emission point, '00008'.

Emission unit UBD1KN is associated with the following emission points (EP):  
00008

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

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Process: 1KN is located at Building BOARD - Wallboard drying is accomplished by feeding rough cut board into multideck kiln where the wallboard comes in direct contact with hot combustion gases.

Emission unit UBD2KN - Drying process of wet wallboard for number two production line. It consists of one emission point '00011'.

Emission unit UBD2KN is associated with the following emission points (EP):  
00011

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

Process: 2KN is located at Building BOARD - Wallboard drying is accomplished by feeding rough cut board into multideck kiln where the wallboard comes in direct contact with hot combustion gases.

Emission unit UBDSTC - Stucco conveying system from bulk storage to board production operation.

Emission unit UBDSTC is associated with the following emission points (EP):  
00060, 00061

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

Process: IRS is located at FIRST, Building MILL - Ventilation for stucco screening system No. 1.

Process: ORS is located at FIRST, Building MILL - Ventilation for stucco screening system No. 2.

Emission unit UOCSR - Sizing of gypsum rock for drying process. It consists of one emission point '00052'.

Emission unit UOCSR is associated with the following emission points (EP):  
00052

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

Process: CRP is located at SECOND, Building MILL - Venting of fugitive dust emissions from crushing equipment.

Emission unit UOO3RM - No. 3 Raymond Mill.

Emission unit UOO3RM is associated with the following emission points (EP):  
00030, 00032

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

Process: 3RB is located at FIFTH, Building MILL - Dusting air from the filling of #3 Raymond mill feed bin is vented through the dust collector.

Process: 3RM is located at FIFTH, Building MILL - Venting of grinding and sizing process equipment.

Emission unit UOOOCB - Cooling belt collection system captures fugitive dust created during stucco conveying process from the mill to board plant storage bin. It consists of two emission points '00019' and '00021'.

Emission unit UOOOCB is associated with the following emission points (EP):  
00019, 00021

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

Process: CBX is located at THIRD, Building MILL - Transfer and cooling process of calcined gypsum.

Emission unit UOOOK1 - The kettle (No.1), consists of two emission points '00036' and '00055', which serve as ventilation exhaust for the gypsum calcination process. Point '00036' is calcination exhaust point '00055' is combustion exhaust.

Emission unit UOOOK1 is associated with the following emission points (EP):

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00036, 00055

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

Process: K1P is located at FIRST, Building MILL - Crushed and sized gypsum rock is calcined in kettles to create stucco.

Emission unit UOOOK2 - The kettle (No. 2), consists of two emission points '00037' and '00054', which serve as ventilation exhaust for the gypsum calcination process. Point '00037' is calcination exhaust. Point '00054' is combustion exhaust.

Emission unit UOOOK2 is associated with the following emission points (EP):  
00054

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

Process: 0K2 is located at Building MILL - This process involves the in-kettle calcination of the crushed and sized gypsum. The end product of the process is stucco.

Emission unit UOOOK3 - The kettle (No. 3), consists of two emission points '00038' and '00053' which serve as ventilation exhaust for the gypsum calcination process. Point '00038' is calcination exhaust. Point '00053' is combustion exhaust.

Emission unit UOOOK3 is associated with the following emission points (EP):  
00038, 00053

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

Process: K3P is located at FIRST, Building MILL - Crushed and sized gypsum rock is calcined in kettles to create stucco.

Emission unit UOOOK4 - The kettle (No. 4), consists of two emission points, '00031' and '00040', which serve as ventilation exhaust for the gypsum calcination process. Point '00031' is calcination ventilation exhaust. Point '00040' is combustion exhaust.

Emission unit UOOOK4 is associated with the following emission points (EP):  
00031, 00040

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

Process: K4P is located at FIRST, Building MILL - Crushed and sized gypsum rock is calcined in kettles to create stucco.

Emission unit UOOORD - Free moisture is removed from raw gypsum ore.

Emission unit UOOORD is associated with the following emission points (EP):  
00004

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

Process: RDX is located at FIRST, Building MILL - Free moisture is driven off the gypsum ore before being transferred to Raymond mill for crushing and sizing.

Emission unit UORECL - Reclaim of out of specification gypsum wallboard and plaster products.

Emission unit UORECL is associated with the following emission points (EP):  
00039, 00065

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

Process: RCC is located at FIRST, Building RECLAIM - Grinding, drying and sizing of out of specification gypsum products.



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Emission unit URDAIR - Land plaster from the rock dryer system is conveyed to number '4' land plaster feed bin. It consists of one emission point '00051'.

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

00051

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

Process: RAX is located at SEVENTH, Building MILL - Venting of pneumatic material handling system.

Emission unit UOO1RM - No.1 Raymond Mill D.C.

Pre-Renewal Info: Grinding and sizing of gypsum rock. It consists of one emission point '00034'. It is a process ventilation exhaust

Emission unit UOO1RM is associated with the following emission points (EP):

00034

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

Process: 1RM is located at FIRST, Building MILL - Venting of grinding and sizing process equipment.

Emission unit UOO2RM - No.2 Raymond Mill D.C.

Pre-Renewal Info: Grinding and sizing of gypsum rock. It consists of one emission point '00035'. It is a process ventilation exhaust.

Emission unit UOO2RM is associated with the following emission points (EP):

00035

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

Process: 2RP is located at FIRST, Building MILL - Gypsum ore roller mill with cyclone and fabric filter.

**Title V/Major Source Status**

STONY POINT FACILITY is subject to Title V requirements. This determination is based on the following information:

Facility is Major for both Particulates and Oxides of Nitrogen.

**Program Applicability**

The following chart summarizes the applicability of STONY POINT FACILITY with regards to the principal air pollution regulatory programs:

<b>Regulatory Program</b>	<b>Applicability</b>
PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO

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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.

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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.

<b>SIC Code</b>	<b>Description</b>
3275	GYPSUM PRODUCTS

**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.

<b>SCC Code</b>	<b>Description</b>
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3-05-015-11	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Continuous Kettle: Calciner
3-05-015-04	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Conveying
3-05-015-21	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE End Sawing (8 Ft.)
3-05-015-18	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Mixers/Conveyors
3-05-015-02	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Primary Grinder/Roller Mills
3-05-015-01	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Rotary Ore Dryer
3-05-015-07	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Screening: Gypsum Ore
3-05-015-09	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Storage Bins: Gypsum Ore
3-05-015-14	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Storage Bins: Stucco

**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	Range

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000630-08-0	CARBON MONOXIDE	87355
0NY210-00-0	OXIDES OF NITROGEN	351942
0NY075-00-0	PARTICULATES	291708
007446-09-5	SULFUR DIOXIDE	51103
0NY998-00-0	VOC	7403

**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)**

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

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

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

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

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

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

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

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

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

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

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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,

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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

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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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>	<b>Condition</b>
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	43
FACILITY	40CFR 60-000	Rock, gravel, sand, and clay processing and conveying	35, 36
FACILITY	40CFR 60-000.672 (a)	Rock, gravel, sand, and clay processing and	37, 38

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FACILITY	40CFR 60-UUU.732 (a)	conveying - standard for particulate matter	39
		Standards of performance for calciners and dryers in mineral industries	
U-OOOK2/-/OK2	40CFR 60-UUU.736	standards for particulate matter	42
		Standards of performance for calciners and dryers in mineral industries	
FACILITY	40CFR 68	test methods and procedures	21
		Chemical accident prevention provisions	
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	22
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	44
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	12
FACILITY	6NYCRR 201-3.2 (a)	Exempt Activities - Proof of eligibility	13
FACILITY	6NYCRR 201-3.3 (a)	Trivial Activities - proof of eligibility	14
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 40, 41
FACILITY	6NYCRR 201-6.5 (a) (4)	General conditions	15
FACILITY	6NYCRR 201-6.5 (a) (7)	General conditions	
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FACILITY	6NYCRR 201-6.5 (a) (8)	General conditions	16
FACILITY	6NYCRR 201-6.5 (c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5 (c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5 (d) (5)	Compliance schedules	17
FACILITY	6NYCRR 201-6.5 (e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5 (f) (6)	Off Permit Changes	18
FACILITY	6NYCRR 201-6.5 (g)	Permit shield	24
FACILITY	6NYCRR 202-1.1	Required emissions tests.	19
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution	45

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FACILITY	6NYCRR 211.3	prohibited. General Prohibitions - visible emissions limited	20
FACILITY	6NYCRR 212.10 (a) (1)	NOx and VOC RACT required at major facilities	31
FACILITY	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	25, 26
FACILITY	6NYCRR 212.5	Applicable emission standards	27
FACILITY	6NYCRR 212.5 (e)	Applicable emission standards	28
FACILITY	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	29, 30
FACILITY	6NYCRR 215	Open Fires	9
FACILITY	6NYCRR 225-1.2 (a) (2)	Sulfur in Fuel Limitations Post 12/31/87.	32
FACILITY	6NYCRR 227-2.4 (g)	Emission limitations for other combustion sources.	33
FACILITY	6NYCRR 231-2.6	Emission reduction credits	34

**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.

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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.

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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.

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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 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

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 there applicability thresholds and sets

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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, STONY POINT FACILITY has been determined to be subject to the following regulations:

40CFR 60-000

This regulation sets forth the limitations for non-metallic mineral processing plants. These limitations focus on the emissions of particulate matter from the processing of non-metallic minerals, such as gypsum, stone and gravel, clay, etc. The emissions of particulate matter are limited to 0.022 grains per dry standard cubic feet.

40CFR 60-000.672 (a)

This regulation limits the opacity of emissions from a stack at a non-metallic processing facility to not greater than 7%. Further, the emissions of particulate matter from the stack may not exceed 0.022 grains per dry standard cubic feet.

40CFR 60-UUU.732 (a)

The regulation sets limitations for opacity and particulate matter.

40CFR 60-UUU.736

Written reports shall be submitted for all compliance tests.

6NYCRR 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 212.10 (a) (1)

This regulation requires owners and operators of facilities, located in lower Orange County and the New

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York City metropolitan areas, that have emissions of volatile organic compounds or oxides of nitrogen in excess of 25 tons per year, to comply with the Reasonably Available Control Technology requirements of 6 NYCRR Part 212.10.

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 .5

Stack tests shall be performed fro all or selected emission point upon request of the department.

6NYCRR 212 .5 (e)

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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 227-2.4 (g)

This subdivision is meant to require RACT on a significant combustion source which has no RACT provisions. This includes those units which have been "exempted." Rather than treat a significant source that falls below the size cutoffs of other subdivisions in this section as requiring no control, if the unit emits over 3 lb/hr uncontrolled or more than 15 lb./day.

As an example, a 300 hp internal combustion engines which is uncontrolled is exempt from needing a permit upstate. However, this unit emits about 7 lb/hr. This unit is a significant source of NOx and should therefore have RACT applied.

6NYCRR 231-2.6

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.



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The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6.

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Short Description</b>	<b>Regulation</b>
U-000K2	Lowest achievable emission rate, LAER	6NYCRR 231-2.5
Reason: For VOCs the existing facility emission potential is less than the major facility size threshold and the project emission potential is less than the significant source project threshold. For NOx the project emission potential exceeds the significant source project threshold. Yet, the net emissions increase is less than the significant net emissions increase threshold. To this effect LAER is not required at this time.		

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

**Compliance Certification**

Summary of monitoring activities at STONY POINT FACILITY:

<b>Location Facility/EU/EP/Process/ES</b>	<b>Type of Monitoring</b>	<b>Cond No.</b>
FACILITY	record keeping/maintenance procedures	35
FACILITY	record keeping/maintenance procedures	36
FACILITY	monitoring of process or control device parameters as surrogate	37
FACILITY	monitoring of process or control device parameters as surrogate	38
FACILITY	intermittent emission testing	39
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	record keeping/maintenance procedures	7
FACILITY	monitoring of process or control device parameters as surrogate	25
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	29
FACILITY	record keeping/maintenance procedures	30
FACILITY	work practice involving specific operations	32
FACILITY	record keeping/maintenance procedures	33

**Basis for Monitoring**

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^This is major facility whose major emissions are NOx, Particulates and VOC. The facility has a Title V permit which is renewed.