New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-5522-00087/00019
Renewal Number: 2
03/07/2014

Name: CONTINENTAL BUCHANAN LLC
Address: 350 BROADWAY
BUCHANAN, NY 10511-1010

Owner/Firm
Name: CONTINENTAL BUCHANAN LLC
Address: 350 BROADWAY
BUCHANAN, NY 10511, USA
Owner Classification: Corporation/Partnership

Permit Contacts
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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
This is an application for the second renewal of the Site's Title V permit. This application does not involve any new work. This application will incorporate administrative changes to the permit.

Attainment Status
CONTINENTAL BUCHANAN LLC is located in the town of CORTLANDT in the county of

WESTCHESTER.
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 is gypsum wall board manufacturing facility which is operating under Title V permit. The Facility is major for NOx emissions.

Permit Structure and Description of Operations
The Title V permit for CONTINENTAL BUCHANAN LLC
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.

CONTINENTAL BUCHANAN LLC is defined by the following emission unit(s):

Emission unit 0000F3 - This emission unit represents a) all of the fugitive-natural-(raw)-gypsum

particulate- emissons-sources associated with the crusher building which are not regulated by a NSPS and b) all the fugitive-synthetic-gypsum-particulate emissions-sources associated with the new short transfer screw, and the new end trim elevator.

Process: 00A is located at Building MILL - This process represents all of the fugitive particulate sources from inside the crusher building including screening, crushing and conveyance. Particulate matter (from natural or synthetic gypsum) that does not settle out exists the building through wall openings, open doors and wall vents.

Process: 00B is located at Building MILL - This process includes fugitive particulate (natural or synthetic gypsum) emissions associated with the crusher building outdoor baghouse screw conveyor.

Process: 11A is located at Building MILL - This process is associated with the emission sources that generate fugitive emissions associated with the material transfer from the new end trim bucket elevator to existing plant feed conveyor. This process is located inside the building.

Emission unit 0000F1 - This emission unit represents the following sources:
1) the clam shell - which was added to the site under Ren2, Mod2,
2) the unloading hopper - which was installed pre- Ren2 Mod2,
3) the unloading hopper- which was installed at the site pre- Ren2, Mod2
4) the bin discharge - which was installed at the site under Ren2, Mod2, and
5) the belt conveyor - which was installed at the site pre- Ren2, Mod2. The conveyor motor is rated at 1850 tons/hr.

This emission unit's components are employed to convey natural (raw) or synthetic gypsum or both from the vessels up to the storage sheds. In addition, this unit includes emissions from the wind erosion of synthetic or natural gypsum stock piles.

The motor of the conveyor had been replaced in a previous modification (Ren 0 Mod 3) with a new motor. The third modification of the original Title V permit (Ren 0, Mod 3) states: "The new motor operates at a higher speed thereby increasing the conveyor rate from 1,200 tons/hr to 1,850 tons/hr. A possible result of this change was an increase of particulate fugitives."

Process: 000 is located at Building NONE - This process includes all of the fugitive particulates associated with ship unloading and stockpiling of raw natural material. Fugitives are generated when the main conveyor conveys raw gypsum from vessels up to the storage sheds. Modification No. 3 of the initial Title V permit (Ren 0, Mod 3) delt with the replacement of the motor that drives the conveyor. The new motor operates at a higher

speed thus increasing the material transfer rate from 1,200 tons/hr to 1,850 tons/hr, resulting in increased emissions.

Process: 001 is located at Building NONE - This process includes all of the fugitive particulate sources from the unenclosed areas of the facility that are associated with management and/or processing of fresh or old reclaimed gypsum which are not regulated by a NSPS.

Process: 004 is located at Building NONE - This process includes all of the fugitive particulate emission sources from unenclosed areas of the facility that are not associated with either ship unloading of natural raw material stockpiling or with the management and/or processing of fresh or old reclaimed gypsum or with the crusher building or with the mechanical conveyance of crushed rock.

Process: 006 is located at Building NONE - Fugitive particulate emissions occur from storage piles due to raw natural gypsum unloading activities, equipment traffic and wind erosion.

Process: 09A is located at Building NONE - This process includes all of the fugitive particulates associated with ship unloading and stockpiling of raw synthetic material. Fugitives are generated when the main conveyor conveys synthetic gypsum from vessels up to the storage sheds.

Process: 09B is located at Building NONE - This process includes all of the fugitive particulate emission sources from unenclosed areas of the facility that are not associated with either ship unloading of synthetic raw material stockpiling or with the management and/or processing of synthetic gypsum or with the crusher building or with the mechanical conveyance of synthetic raw gypsum.

Process: 09C is located at Building NONE - This process includes all the fugitive particulate emission sources associated with synthetic gypsum material transfer from the new upoading hopper to the existing belt conveyor. These fugitive emissions are occuring outdoors.

Process: 09D is located at Building NONE - This process includes all of the synthetic gypsum fugitive particulate emissions resulting from wind erosion of the synthetic gypsum stockpile.

Emission unit 000E33 - This emission unit comprise the end trim saw process and its associated controls.

Emission unit 000E33 is associated with the following emission points (EP):
0PT33
Process: 033 is located at Building PLANT -

Emission unit 000E31 - This emission unit consists of a stucco cooling system that vents to a dedicated baghouse.

Emission unit 000E31 is associated with the following emission points (EP):

0PT31
Process: 031 is located at Building MILL -

Emission unit 0000F7 - This emission unit covers the new reclaim system which includes a receiving hopper/feeder and conveyor system. This emission unit is located inside the crusher building. This unit started operation in January of 2006 and was modified with Modification No.1 to the first Renewal of the permit (R1-M1) which was submitted in July 1, 2008.

This R1-M1 covers additional equipment such as the new gypsum waste crusher, feeder, hopper and associated conveying equipment inside the crusher building. The crusher and feeder (located inside the crusher building) will be subject to NSPS Subpart OOO requirements.

Process: 08A is located at Building CRUSHER - This process covers the Williams crusher fro mixed dry and wet waste board located inside the crusher building. Particulate matter that doesnot settle out may escape the building through wall openings, open doors and wall vents. The waste crusher will be subject to NSPS OOO requirements.

Process: 08B is located at Building CRUSHER - This process covers the loading Hopper for de-papered pulverized board located outside the crusher building. This process will only generate fugitive particulate emissions. Loading to the hopper will be done through an existing front end loader. This process is exempt from requirements of NSPS subpart OOO.

Process: 08C is located at Building CRUSHER - This process covers the new Single J.C. Steele feeder for feeding the de-papered pulverized waste board to the main plant conveyor belt. This process will be located inside the crusher building. Particulate matter that does not settle out may escape the building through wall openings, open doors and wall vents. The new feeder will be subject to NSPS subpart OOO.

Process: 08D is located at Building CRUSHER - This process represents the new conveyors to be added as part of the recycle System Modification. There are total of 3 drop points associated with the conveying system which are as follows: 1) From Hopper Conveyor to J.C. Steele Feeder, 2) From J.C. Steel Conveyor to existing plant feed conveyor and 3) From z conveyor to existing J.C. Steele Double Metering Feeder. The process throughout of each drop point is 20 tons per hour, therefore, the combined throughput is listed as 60 tons per hour below.

Process: O7A is located at Building CRUSHER - This process involves the conveying of reclaimed

gypsum via the receiving hopper and the recaliming conveyor. This process may genarate emissions of particualte matter.

Process: O7B is located at Building CRUSHER - This process involves the metering on reclaim conveyor feeder system. Associated emission included particulate matter.

Emission unit 0000F4 - This emission unit represents all of the fugitive particulate sources associated with the main plant building.

Process: F4A is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the Two Rotary Screens to Two entrollers. This process is located indoors.

Process: F4D is located at Building MILL - This process includes fugitive particulate emissions (from natural raw or synthetic gypsum) associated with material transport from the existing Plant Feed Conveyor to the new Belt Conveyor A. This process is located inside the building.

Process: F4E is located at Building MILL - This process includes fugitive particulate emissions associated with the material transport from the new Belt Conveyor A to LP Mill Feed Bin. This process is located inside the building.

Process: F4F is located at Building MILL - This process includes fugitive particulate emissions associated with the material transport from the LP Mill Feed Bin to the new Feed Belt Conveyor. This process is located inside the building.

Process: F4G is located at Building MILL - This process includes fugitive particulate emissions associated with material transport from the Feed Belt Conveyor to LP Mill. This process is located inside a building.

Process: F4H is located at Building MILL - This process includes fugitive particulate emissions associated with material transport from the existing Plant feed conveyor to the new Belt Conveyor B. This process is located indoors.

Process: F4I is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the new belt conveyor B to Calcining Mill Feed Bin. This process is located indoors.

Process: F4J is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the Calcining Mill Feed Bin to the new Weigh belt Conveyor. This process is located indoors.

Process: F4K is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the new Weigh Belt Conveyor to the Calcining MIll. This process is located indoors.

Process: F4L is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the existing collection Screw Conveyor to the new Reversing Screw Conveyor. This process is located indoors.

Process: F4M is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the new Reversing Screw Conveyor to the New Bucket Elevator. This process is located indoors.

Process: F4N is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the Bucket Elevator to the Transfer Screw Conveyor. This process is located indoors.

Process: F4O is located at Building MILL - This process includes fugitive particulate emissions associated with Bin Vent Filters for LP Mill Feed Bin. This process is located inside a building.

Process: F4P is located at Building MILL - The process includes fugitive particulate emissions associated with the Bin Vent Filters for Calcining Mill Feed Bin. This process is located indoors.

Process: F4Q is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the new Reversing Screw Conveyor to the Sojourney Screw Conveyor. This process is located indoors.

Process: F4R is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the Transfer Conveyor tot he Oversize Collection System. This process is located indoors.

Process: F4S is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the Oversize Collection Screw to the ground Floor. This process is located indoors.

Process: F4T is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the two Rotary Screens to the Oversize Collection Screw. This process is located indoors.

Process: F4U is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the Oversize Collection Screw to the Return Screw No.1. This process is located indoors.

Process: F4V is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the two Entoleter to the ReturnScrew No.1. This process is located indoors.

Process: F4W is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the Return Screw No.1 to the return Screw No.2. This process is located indoors.

Process: F4X is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the new screw No.2 to the Sojourner Screw Inlet. This process is located indoors.

Process: F4Y is located at Building MILL - The process includes fugitive particulate emissions associated with material transport from the Return Screw No.2 to the Sojourner Screw Outlet. This process is located indoors.

Process: F4Z is located at Building MILL - The process includes fugitive particulate emissions associated

with material transport from the new Transfer Screw Conveyor to Two Rotary Screens. This process is located indoors.

Emission unit 0000F6 - This emission unit covers the new rock crusher and associated equipment located inside the crusher building. The rock crusher will be subject to NSPS Subpart OOO.

Process: 06A is located at Building CRUSHER - This process comprise the crushing of rock inside the crusher building. Particulate matter is the pollutant associated with this process.

Emission unit 000E17 - Modification No.2 of the Renewal No.1 of the Title V permit addresses the replacement of Raymond Mill No.2 with a Landplaster Mill. The Landplaster Mill (LP Mill) consists of a low NOx burner with maximum heat input capacity of 0.70 MMBtu/hr. The unit includes a double cone classifier, air heater, system fan, dust collector and connective duct work. NOx emissions for the new LP Mill burner are calculated based on ventor guarantee emission factors which are to be confirmed with stack tests to be performed within 180 days of the operation of this unit as required under the 6NYCRR Part 202 provisions.

Background:
As per Renewal No.1 Mod 0. This emission unit is comprised of the Raymond Mill No. 2 that vents to a dedicated baghouse. Raymond Mill No.2 was intended to operate for approximately 5 hours per week, 52 weeks a year (i.e. 260 hours per year) on average. It must be noted that this unit had to operate above the intended hours but it always stayed below the permitted emissions cap which enabled the facility to cap out of 231-2.

Emission unit 000E17 is associated with the following emission points (EP):
0PT17
Process: 17A is located at Building LP Mill - This process involves all combustion and particulate emissions related to the operation of the Landplaster Mill when natural (raw) gypsum is the material processed. The Landplaster Mill is equipped with a baghouse for particular control and a low NOx burner rated at maximum heat input capacity of 0.7 MMBtu/hr. NOx emissions from this burner along with emissions from the board dryer (EU38) and Calcining Mill (EU 30) are capped at 40.15 tons per year.

Process: 17B is located at Building LP Mill - This process involves all combustion and particulate emissions related to the operation of the Landplaster Mill when synthetic gypsum is the material processed. The Landplaster Mill is equipped with a baghouse for particular control and a low NOx burner rated at maximum heat input capacity of 0.7 MMBtu/hr. NOx emissions from this burner along with emissions from the board dryer (EU38) and Calcining Mill (EU 30) are capped at 40.15 tons per year.

Emission unit 000E30 - This emission unit comprises the Calcining Mill system. The system consists of an 111 mmbtu/hr natural gas operated Low NOx burner and it is designed to further grind natural or synthetic gypsum while removing free moisture and chemically bound water from the gypsum, forming stucco.

The combined process stream consisting of stucco and combustion byproducts is vented through a bag house system to separate stucco from gas. Bag house performance is based on a pressure differential which is set in accordance with manufacturer's recommendations.

Modification No.2 of the Renewal 1 of the title V permit, addresses the correct rating capacity of the burner which had previously been reported to be 100 mmbtu/hr.

Emission unit 000E30 is associated with the following emission points (EP):
0PT30
Process: 030 is located at Building Calcining - This source serves the combustion and process emissions of the Calcining Mill system. The mill system has a design heat input rating of 111 MMbtu/hr (pior to Ren 1 Mod 2 it had been operated at 100 mmbtu/hr) and combusts natural gas.

Emission unit 000E38 - This emission unit consists of a board dryer. The dryer has a maximum heat input capacity of 157 mmbtu/hr. This is an existing emission unit and no changes are being made due to this modification(Ren1 Mod2). It is only included for informational purposes since this operation is part of the combined NOx emissions cap for the facility.

Emission unit 000E38 is associated with the following emission points (EP):
0PT38
Process: 038 is located at Building Dryer -

Emission unit 000E39 - Aerosol Emptying System - Fugitive Emissions of VOC - Insignificant emissions activity

An insignificant VOC emissions increase of about 0.0125 tons/year has been documented. This amount constitute insignificant increase and it is attributed to various types of aerosol can products that are used within the facility for maintenance activities.

Before properly disposing of aerosol cans, their contents are emptied at two aerosol can puncturing stations. The equipment is an "off the self"system that punctures a hole in the can to release pressure and allows its contents to empty into an attached 55-gallon drum. The outlet of the drum is fitted to capture mists and VOCs. The filters are changed when they are full. The drums are disposed of as a hazardous waste. The aerosol can emptying system has been in place at the site since 2011.

The aerosol can emptying system may produce minimal amounts of fugitive VOC emissions. It is estimated that approximately 250 lbs of flammable liquids and propellants from aerosol cans may be captured and disposed of in drums each year. It is expected that the control system (drum and filters) will capture at least 90% of the evacuated material. Thus the process will generate less than 25 lbs/yr of VOC.

Process: E39 is located at Building MAIN PLANT - Aerosol cans emptying and VOC capturing system.

Emission unit 000E32 - This emission unit comprises all air contamination sources located in the "dry additives" area.

Emission unit 000E32 is associated with the following emission points (EP):
0PT32
Process: 032 is located at Building PLANT - This process comprises the addition of additives to the slurry that will become wall board. Its emissions are vented outdoors through a baghouse.

Emission unit 0000F2 - This emission unit represents the emission sources located inside the rock hopper building, the new dump hopper, the new J.C. Steele Feeder and the new transfer belt conveyor.

Process: 005 is located at Building Rock Hop. - This process includes all of the fugitive particulate sources from inside the rock hopper building. Particulate matter that does not settle out exits the building through wall openings, open doors and wall vents.

Title V/Major Source Status
CONTINENTAL BUCHANAN LLC is subject to Title V requirements. This determination is based on the following information:
The facility is major for emissions of Nitrogen oxides.

Program Applicability
The following chart summarizes the applicability of CONTINENTAL BUCHANAN LLC with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
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
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.

SCC Code	Description
3-05-015-03	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE NOT CLASSIFIED **
3-05-015-04	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Conveying
3-05-015-05	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE PRIMARY CRUSHING: GYPSUM ORE
3-05-015-08	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Stockpile: Gypsum Ore
3-05-015-13	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Impact Mill
3-05-015-18	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Mixers/Conveyors
3-05-015-20	MINERAL PRODUCTS MINERAL PRODUCTS - GYPSUM MANUFACTURE Drying Kiln
3-05-040-30	MINERAL PRODUCTS MINERAL PRODUCTS - MINING & QUARRYING OF NONMETALLIC MINERALS Primary Crusher
3-05-103-98	MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS OPEN

	STOCKPILES Mineral: Specify in Comments
4-90-999-98	ORGANIC SOLVENT EVAPORATION MISCELLANEOUS VOLATILE ORGANIC COMPOUND EVAPORATION Identify the Process and Solvent in Comments

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service 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	PTE Range
000630-08-0	CARBON MONOXIDE		>= 100 tpy but < 250 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	80300	
0NY075-00-0	PARTICULATES		>= 100 tpy but < 250 tpy
0NY075-00-5	PM-10		>= 100 tpy but < 250 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
0NY100-00-0	TOTAL HAP		> 0 but < 2.5 tpy
0NY998-00-0	VOC		>= 10 tpy but < 25 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;
(3) During the period of the emergency the facility owner 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 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 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 - 6 NYCRR 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 6 NYCRR 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 201-6.2(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 201-6.2(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 201-6.4(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 201-6.4(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 201-6.4(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 201-6.4(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.4(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 201-6.4(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 201-6.4(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 2 01-6.7 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	ECL 19-0301	52	Powers and Duties of the Department with respect to air pollution control
0-00E17	40CFR 60-A.8	42	General provisions - Performance tests
0-00E17	40CFR 60-A.8(a)	43	Performance Tests
FACILITY	40CFR 60-OOO.672(b)	33, 34, 35	Rock, gravel, sand, and clay processing and conveying - standard for particulate matter
FACILITY	40CFR 60-OOO.672(e)	36, 37	Rock, gravel, sand, and clay processing and conveying - standard for particulate matter
0-00E30/0PT30	40CFR 60-UUU	46, 47	Standards of performance for calciners and dryers in mineral industries
0-00E31	40CFR 64	48, 49	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.

FACILITY	6NYCRR 201-1.4	53	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
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	21, 38, 39	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7	23, 24, 25	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1	26, 27, 28	Emission Testing, Sampling and Analytical Determinations
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	29	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	54	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212.10	31	NOx and VOC RACT required at major facilities
0-00E17	6NYCRR 212.11(b)(5)	41	Sampling and monitoring
0-00E39	6NYCRR 212.4	51	General Process Emission Sources -

			emissions from new sources and/or modifications
0-00E17	6NYCRR 212.4(c)	40	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6(a)	30	General Process Emission Sources - opacity of emissions limited
0-00E17/0PT17	6NYCRR 212.6(a)	44	General Process Emission Sources - opacity of emissions limited
0-00E31/0PT31	6NYCRR 212.6(a)	50	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 221.2	55	Prohibition.
FACILITY	6NYCRR 227-1.3(a)	32	Smoke Emission Limitations.
0-00E30/0PT30	6NYCRR 227-2.4(g)	45	Other combustion installations.
FACILITY	6NYCRR 231-2	24, 25	New Source Review in Nonattainment Areas and Ozone Transport Region

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

ECL 19-0301
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.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 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

6 NYCRR 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.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR Subpart 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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 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.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 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.

6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and there 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, CONTINENTAL BUCHANAN LLC has been determined to be subject to the following regulations:
40 CFR 60.672 (b)
Initial performance test was performed. Facility is in comliance.

40 CFR 60.672 (e)
Upon request by the regulatory agency, the facility has to perform tests to ensure that particulate emissions, from building's vents, are below 0.022 grains per standard square foot of air vented.

40 CFR 60.8
This general provision of the New Source Performance Standards or NSPS, sets forth the performance test requirements for all NSPS applicable sources. Basically, all performance tests must be conducted within 60 days after achieving the maximum production rate but no later than 180 days after initial startup using procedures consistent with methods and procedures approved by the Administrator.

40 CFR 60.8 (a)
This regulation contains the requirements for the completion date and reporting of Performance Testing (stack testing), at the facility. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner or operator of the facility must conduct performance test(s) and furnish a written report of the test results.

40 CFR Part 60, Subpart UUU
This regulation sets forth the limitations on emissions from calciners and dryers in mineral industries. The emissions of particulates from stacks at these facilities are limited to 0.040 grains per dry standard cubic foot. In addition, the opacity from these stacks may not exceed 10%.

40 CFR Part 64
The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6 NYCRR 211.1
This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212.10
The facility has submitted a NOx RACT plan. NOx RACT requirements are met by employing low NOx burner.

6 NYCRR 212.11 (b) (5)
This section sets the requirements for sampling, monitoring, recordkeeping, and reporting from process sources using continuos monitors.

6 NYCRR 212.4
This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6 NYCRR 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.

6 NYCRR 212.6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 221.2
Spraying of asbestos to surface coating is prohinbited.

6 NYCRR 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.

6 NYCRR 227-2.4 (g)
This subdivision establishes NOx RACT for emission sources that are subject to this rule but not specifically regulated under the other source categories of this rule.

6 NYCRR Subpart 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6 NYCRR Subpart 202-1
This subpart of Part 202 establishes the general criteria for verifying emissions by means of emissions sampling, testing and associated analytical determinations.

6 NYCRR Subpart 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.

Compliance Certification
Summary of monitoring activities at CONTINENTAL BUCHANAN LLC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
0-00E17	42	record keeping/maintenance procedures
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	34	monitoring of process or control device parameters as surrogate
FACILITY	35	monitoring of process or control device parameters as surrogate

FACILITY	36	monitoring of process or control device parameters as surrogate
FACILITY	37	monitoring of process or control device parameters as surrogate
0-00E30/0PT30	46	monitoring of process or control device parameters as surrogate
0-00E30/0PT30	47	monitoring of process or control device parameters as surrogate
0-00E31	48	record keeping/maintenance procedures
0-00E31	49	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	monitoring of process or control device parameters as surrogate
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
0-00E17	41	monitoring of process or control device parameters as surrogate
0-00E39	51	record keeping/maintenance procedures
0-00E17	40	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
0-00E17/0PT17	44	monitoring of process or control device parameters as surrogate
0-00E31/0PT31	50	monitoring of process or control device parameters as surrogate
FACILITY	32	monitoring of process or control device parameters as surrogate
0-00E30/0PT30	45	record keeping/maintenance procedures

Basis for Monitoring

The Facility is monitored for Oxides of Nitrogen as this is the contaminant of concern in this ozone non-attainment area.