



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

**Facility Identification Data**

Name: SABIC INNOVATIVE PLASTICS US LLC

Address: 1 NORYL AVE

SELKIRK, NY 12158

**Owner/Firm**

Name: SABIC INNOVATIVE PLASTICS US LLC

Address: 1 NORYL AVE

SELKIRK, NY 12158, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

Name: JAMES J ELDRED

Address: NYSDEC - REGION 4

1130 N WESTCOTT RD

SCHENECTADY, NY 12306-2014

Phone:5183572068

Division of Air Resources:

Name: DONALD A WELSTED

Address: NYSDEC - REGION 4

1130 N WESTCOTT RD

SCHENECTADY, NY 12306

Air Permitting Contact:

Name: JAMES J CASCIONE

Address: SABIC INNOVATIVE PLASTICS

1 NORYL AVE

SELKIRK, NY 12158

Phone:5184753596

**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**

The PPO Resin process is to be modified by installing several pieces of process equipment and retasking four tanks in order to manufacture four new Resin products. Changes in piping and operating methods will also be implemented.



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

**Attainment Status**

SABIC INNOVATIVE PLASTICS US LLC is located in the town of BETHLEHEM in the county of ALBANY.

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*	MARGINAL 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:**

SABIC operates a plastic resin facility (SIC 2821) located in albany County, New York, in the Hamlet of Selkirk, New York. The facility is approximately eight miles southwest of Albany, New York. The facility is on a 700-acre site, of which 60 acres are industrilaized. Monomer is either produced (SIC 2869) from raw material or purchased. The monomers are polymerized to form plastic resins. Manufactured and purchased resins are compounded at the facility by adding colorants and other ingredients to provide desired properties. The facility includes continuous and batch processes, a packaging operation, process heaters, and waste water treatment plant. The facility operates 24 hours per day, seven days a week.

**Permit Structure and Description of Operations**

The Title V permit for SABIC INNOVATIVE PLASTICS US 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



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

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

SABIC INNOVATIVE PLASTICS US LLC is defined by the following emission unit(s):

Emission unit RESBLG -

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

00306, 00310, 00312, 00313, 00314, 00337, 00341, 00343, 00344, 00367, 00368, 00369, 00370, 00381, 00401, 00419, 00437, 00447, 00459, 00460, 00461, 01305, 01355, 01356, 01357, 01358, 01359, 01365, 01366, 01378, 01379, 01390, 01391, 01392, 01394, 01395

Process: RFE is located at RESIN, Building RESIN - This process is for Resin Plant fugitive emissions. This process ID "RFE" includes the following emission sources:

- 1) RLDAR for MON MACT equipment leaks (Leak Detection and Repair),
- 2) R-PWW for MON MACT Process Wastewater,
- 3) R-HES for the MON MACT Heat Exchange Systems (Areas 3 and 8 cooling tower systems), and
- 4) R-MWW for MON MACT Maintenance Wastewater.

Process: RPH

Process: RPV is located at RESIN, Building RESIN - HBR AND IVS VENTS.

Process: RRX RESIN REACTORS.

Process: RSH is located at RESIN, Building RESIN -

Process: RT1 is located at RESIN, Building RESIN -

Process: RT2 is located at RESIN, Building RESIN - VOC RACT TANKS.

Process: RT3 is located at RESIN, Building RESIN -

Process: RT4 is located at RESIN - RESIN TANK TRUCK USED FOR TRANSFER OF EVAPORATOR BOTTOMS OFF-SITE.

Process: RT5 is located at RESIN, Building RESIN -

Process: RT6 is located at RESIN, Building RESIN -

Process: RWS

Emission unit CXPRSS - COLORXPRESS processes plastic for internal and external use.

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

05000, 05004, 05005

Process: CXP COLORXPRESS PROCESSES.

Emission unit HIPSBG - HIPS PRODUCES PLASTIC MATERIALS.

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

03000, 03001, 03002, 03003, 03004, 03005, 03008, 03009, 03010, 03011, 03012, 03013, 03014, 03022, 03023, 03032, 03033, 03041, 03045

Process: HEX is located at HIPS, Building HIPS - DIE HOODS AND SLURRY TANK.

Process: HFE is located at HIPS, Building HIPS - LDAR, PROCESS WASTEWATER, MAINTENANCE WASTEWATER AND HEAT EXCHANGER SYSTEMS.

Process: HPV is located at HIPS, Building HIPS - DEVOL, DISTILLATION, FEED PREP, EXTRUSION.

Process: HSH is located at HIPS, Building HIPS - STABILIZER, VACUUM CLEANING SYSTEM.

Process: HT1 is located at HIPS, Building HIPS - VOL STORAGE RACT TANKS.

Process: HT2 is located at HIPS, Building HIPS - NON VOC RACT TANKS.

Process: HT3 is located at HIPS, Building HIPS - VOC RACT TANKS.



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

Process: HT4 is located at HIPS, Building HIPS - TANKS WITHOUT CARBON CANISTERS.

Emission unit APAREA - AP AREA MANUFACTURES PHENOLICS FOR INTERNAL AND EXTERNAL USE.

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

00282, 00284, 00704, 01212, 01236, 01239, 01240, 01241, 01247, 01252, 01257, 01258, 01259, 01260, 01266, 01268

Process: AFE is located at AP, Building AP - LDAR, PROCESS WASTEWATER, MAINTENANCE WASTEWATER AND HEAT EXCHANGER SYSTEMS.

Process: AMP is located at AP, Building AP - AP MISCELLANEOUS PROCESS VENTS.

Process: APV is located at AP, Building AP - PROCESS SOURCES.

Process: ASH is located at AP, Building AP - AP CATALYST BUILDING.

Process: AT1 is located at AP, Building AP - EMISSIONS FROM VOL RACT TANKS <20,000 GALLONS.

Process: AT2 is located at AP, Building AP - NON RACT TANKS.

Process: AT3 is located at AP, Building AP - RECYCLE METHANOL TANK

Process: AT4 is located at AP, Building AP - METHANOL STORAGE TANK MF-150.

Process: AT5 HON GROUP 2 STORAGE VESSELS.

Process: HOF is located at AP, Building AP - AP PROCESS 212 VOC/NOX RACT.

Emission unit SFSBLG - SFS IS A COMPOUNDING FACILITY.

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

00511, 00519, 00520, 00526, 00531, 00534, 00539, 00540, 00541, 00542, 00543, 00544, 00546, 00553, 00555, 00556, 00560, 00561, 00568, 00569, 00570, 00571, 00572, 00575, 00576, 00577, 00578, 00579, 00580, 00581, 00582, 00583, 00597, 00603, 00604, 00606, 00610, 01500, 01501, 01502, 01503, 01504, 01505, 01506, 01507, 01508, 01509, 01511, 01517, 01518, 01519, 01520, 01521, 01522, 01525, 01527, 01528, 01530, 01531, 01532, 01533, 01534, 01535, 01537, 01543, 01544, 01548, 01549, 01550, 01551, 01552, 01553, 01555, 01571, 01572, 01583, 01584, 01586, 01587, 01588, 01591, 01592, 01593, 01594, 01595, 01596, 01597, 01598, 01599, 02500, 02512, 02513, 02514, 02517, 02521, 02523, 02526, 02527, 02532, 02533, 02535, 02537, 02538, 02540, 02541, 02542, 02543, 02544, 02545, 02546, 02547, 02550, 02551, 02552, 02581, 02582, 02583, 02584, 02585, 02586, 02587, 02588, 02589, 02590, 02591, 02592, 02593, 02596, 02600, 02601, 02602, 02603, 02604, 02605, 02607, 02608, 02609, 02611, 02613, 02614, 02615, 02616, 02617, 02618, 02619, 02702, 02703, 02704, 02705, 02706, 02707, 02709, 02710, 02711, 02712, 02713, 02714, 02715, 02716, 02717, 02718, 02719, 02720, 02721, 02722, 02725, 02726, 02727, 02728, 02729, 02730, 02731, 02732, 02733, 02734, 02735, 02736, 02737, 02738, 02739, 02740, 02741, 02742, 02743, 02744, 02745, 02746, 02747, 02748, 02749, 02750, 02751, 02752, 02754, 02756, 02757, 02758, 02759, 02763, 02764, 02765, 02766, 02767, 02768, 02769, 02770, 02771, 02772, 02773, 02774, 02775, 02776, 02777, 02778, 02779, 02780, 02781, 02782, 02783, 02784, 02785, 02786, 02787, 02788, 02789, 02790, 02791, 02792, 02793, 02794, 02796, 02797, 02798, 02799, 02800

Process: FEX is located at SFS, Building SFS - CARBON BEDS, HEAF, THERMAL OXIDIZER, VENTS FROM EXTRUSION AND LABS.

Process: FPM Finishing solids handling equipment - insignificant emissions

Process: FPV is located at SFS, Building SFS - THERMAL OXIDIZER COMBUSTION BYPRODUCTS.

Process: FSH is located at SFS, Building SFS - PNEUMATIC CONVEYANCE SYSTEMS, DUST COLL. FINISHING SOLIDS HANDING EQUIPMENT.

Process: FT1 is located at SFS, Building SFS - VOL STORAGE RACT TANKS. FINISHING TANKS.

Process: FT2 is located at SFS, Building SFS - NON RACT TANKS.



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

Emission unit WTAREA - WWTP IS THE PLANT SITE WASTE WATER TREATMENT FACILITY.

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

00709, 00712, 00715, 00717, 00718, 00723, 00727

Process: WPV is located at WWTP, Building WWTP - WW VESSELS, DRUM WASHER/HOT BOX, FBI, LF.

Process: WT1 is located at WWTP, Building WWTP - WASTE OIL TANK.

Process: WT2 is located at WWTP, Building WWTP - NON RACT TANKS.

**Title V/Major Source Status**

SABIC INNOVATIVE PLASTICS US LLC is subject to Title V requirements. This determination is based on the following information:

The facility is major for both the criteria pollutants and HAP (Hazardous Air Pollutants).

**Program Applicability**

The following chart summarizes the applicability of SABIC INNOVATIVE PLASTICS US LLC with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	YES
NESHAP (MACT - 40 CFR Part 63)	YES
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).



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

**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**

2821  
2869

PLASTICS MATERIALS AND RESINS  
INDUSTRIAL ORGANIC CHEMICALS, NEC

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

**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>
1-01-006-02	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION
1-02-006-02	ELECTRIC UTILITY BOILER - NATURAL GAS Boilers < 100 MBtu/Hr except Tangential EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-01-018-05	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Phenolic Resins
3-01-018-17	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION General
3-01-018-19	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Solvent Recovery
3-01-018-21	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Extruding/Pelletizing/Conveying/Storage
3-01-018-40	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION RESIN STORAGE TANK ** (USE 6-45-200-23 OR 6-45-210-23)
3-01-018-90	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION: CATALYST PREPARATION
3-01-018-91	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION: REACTOR VENTS
3-01-018-92	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION: SEPARATION PROCESSES
3-01-018-93	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION - RAW MATERIAL STORAGE
3-01-018-94	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION - SOLVENT STORAGE
3-01-018-99	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION PLASTICS PRODUCTION - OTHERS NOT SPECIFIED

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

3-01-840-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Distillation Units
3-01-888-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - FUGITIVE EMISSIONS Specify in Comments Field
3-01-888-05	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - FUGITIVE EMISSIONS Specify in Comments Field
3-99-900-04	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS MANUFACTURING INDUSTRIES PROCESS GAS: PROCESS HEATERS
3-99-900-14	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS MANUFACTURING INDUSTRIES PROCESS GAS: INCINERATORS
4-07-146-98	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - MISCELLANEOUS FIXED ROOF TANK:MISCELLANEOUS:SPECIFY IN COMMENTS: WORKING LOSS

**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 of 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
000092-52-4	1, 1 BIPHENYL		> 0 but < 10 tpy
000079-34-5	1,1,2,2- TETRACHLOROETHANE		> 0 but < 10 tpy
000057-14-7	1,1-DIMETHYL HYDRAZINE		> 0 but < 10 tpy
000120-82-1	1,2,4-TRICHLOROBENZENE		> 0 but < 10 tpy
000084-74-2	1,2- BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER		> 0 but < 10 tpy
000120-80-9	1,2-BENZENEDIOL		> 0 but < 10 tpy
000107-06-2	1,2-DICHLOROETHANE		> 0 but < 10 tpy
000107-21-1	1,2-ETHANEDIOL		> 0 but < 10 tpy
000108-38-3	1,3 DIMETHYL BENZENE		> 0 but < 10 tpy
000095-80-7	1,3-BENZENEDIAMINE, 4- METHYL-		> 0 but < 10 tpy

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

000106-99-0	1,3-BUTADIENE	> 0 but < 10 tpy
000126-99-8	1,3-BUTADIENE, 2- CHLORO-	> 0 but < 10 tpy
000085-44-9	1,3- ISOBENZOFURANDIONE	> 0 but < 10 tpy
000123-31-9	1,4-BENZENEDIOL	> 0 but < 10 tpy
000123-91-1	1,4-DIETHYLENE DIOXIDE	> 0 but < 10 tpy
000927-62-8	1-BUTANAMINE, N,N- DIMETHYL-	>= 2.5 tpy but < 10 tpy
000063-25-2	1-NAPHTHALENOL, METHYLCARBAMATE	> 0 but < 10 tpy
000098-86-2	1-PHENYLETHANONE	> 0 but < 10 tpy
000542-75-6	1-PROPENE, 1,3-DICHLORO-	> 0 but < 10 tpy
001746-01-6	2,3,7,8- TETRACHLORODIBENZO- P-DIOXIN	> 0 but < 10 tpy
000121-14-2	2,4, DINITRO TOLUENE	> 0 but < 10 tpy
000051-28-5	2,4, DINITROPHENOL	> 0 but < 10 tpy
000088-06-2	2,4,6 TRICHLOROPHENOL	> 0 but < 10 tpy
000094-75-7	2,4- DICHLOROPHENOXYACETI C ACID	> 0 but < 10 tpy
000108-31-6	2,5 - FURANDIONE	> 0 but < 10 tpy
000095-87-4	2,5 XYLENOL	> 0 but < 2.5 tpy
000053-96-3	2- ACETYLAMINOFLUORENE	> 0 but < 10 tpy
000078-59-1	2-CYCLOHEXEN-1- ONE,3,5,5-TRIMETHYL	> 0 but < 10 tpy
000109-86-4	2-METHOXYETHANOL	> 0 but < 10 tpy
000095-48-7	2-METHYL-PHENOL	> 0 but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL	> 0 but < 10 tpy
000079-10-7	2-PROPENOIC ACID	> 0 but < 10 tpy
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	> 0 but < 10 tpy
000091-94-1	3,3'-DICHLOROBENZIDINE	> 0 but < 10 tpy
000119-90-4	3,3'- DIMETHOXYBENZIDINE	> 0 but < 10 tpy
000107-05-1	3-CHLORO-1-PROPENE	> 0 but < 10 tpy
000100-40-3	4 VINYL CYCLOHEXENE	> 0 but < 2.5 tpy
000101-77-9	4,4'- DIAMINODIPHENYLMETH ANE	> 0 but < 10 tpy
000101-14-4	4,4-METHYLENE BIS(2- CHLOROANILINE)	> 0 but < 10 tpy
000060-11-7	4- DIMETHYLAMINOAZOBEN ZENE	> 0 but < 10 tpy
000092-93-3	4-NITROBIPHENYL	> 0 but < 10 tpy
000075-07-0	ACETALDEHYDE	> 0 but < 10 tpy
000060-35-5	ACETAMIDE	> 0 but < 10 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER	> 0 but < 10 tpy
000079-11-8	ACETIC ACID, CHLORO	> 0 but < 10 tpy
000075-05-8	ACETONITRILE	> 0 but < 10 tpy
000107-02-8	ACROLEIN	> 0 but < 10 tpy
000532-27-4	ALPHA- CHLOROACETOPHENONE	> 0 but < 10 tpy
007664-41-7	AMMONIA	>= 2.5 tpy but < 10 tpy
000062-53-3	ANILINE	> 0 but < 10 tpy
007440-36-0	ANTIMONY	> 0 but < 10 tpy
007440-38-2	ARSENIC	> 0 but < 10 tpy
001332-21-4	ASBESTOS	> 0 but < 10 tpy
000075-55-8	AZIRIDINE, 2-METHYL	> 0 but < 10 tpy
007440-39-3	BARIUM	> 0 but < 2.5 tpy

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

000114-26-1	BAYGON	> 0 but < 10 tpy
000090-04-0	BENZENAMINE, 2-METHOXY	> 0 but < 10 tpy
000095-53-4	BENZENAMINE, 2-METHYL	> 0 but < 10 tpy
000121-69-7	BENZENAMINE, N, N-DIMETHYL	> 0 but < 10 tpy
000071-43-2	BENZENE	> 0 but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL)	> 0 but < 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO-	> 0 but < 10 tpy
000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-	> 0 but < 10 tpy
000098-07-7	BENZENE, TRICHLOROMETHYL	> 0 but < 10 tpy
000095-47-6	BENZENE, 1,2-DIMETHYL	> 0 but < 10 tpy
026140-60-3	BENZENE, DIPHENYL-	> 0 but < 2.5 tpy
000092-87-5	BENZIDINE	> 0 but < 10 tpy
000100-44-7	BENZYL CHLORIDE	> 0 but < 10 tpy
007440-41-7	BERYLLIUM	> 0 but < 10 tpy
000057-57-8	BETA-PROPIOLACTONE	> 0 but < 10 tpy
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE	> 0 but < 10 tpy
025971-63-5	BISPHENOL A PHOSGENE POLYCARBONATE	>= 2.5 tpy but < 10 tpy
000075-25-2	BROMOFORM	> 0 but < 10 tpy
000123-72-8	BUTANAL	>= 10 tpy but < 25 tpy
000106-97-8	BUTANE	> 0 but < 2.5 tpy
007440-43-9	CADMIUM	> 0 but < 10 tpy
000133-06-2	CAPTAN	> 0 but < 10 tpy
000051-79-6	CARBAMIC ACID, ETHY ESTER	> 0 but < 10 tpy
000079-44-7	CARBAMIC CHLORIDE, DIMETHYL	> 0 but < 10 tpy
000124-38-9	CARBON DIOXIDE	>= 100 tpy but < 250 tpy
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS	>= 100 tpy but < 250 tpy
000075-15-0	CARBON DISULFIDE	> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 50 tpy but < 100 tpy
000056-23-5	CARBON TETRACHLORIDE	> 0 but < 10 tpy
000463-58-1	CARBONYL SULFIDE	> 0 but < 10 tpy
000133-90-4	CHLORAMBEN	> 0 but < 10 tpy
007782-50-5	CHLORINE	> 0 but < 10 tpy
000108-90-7	CHLOROBENZENE	> 0 but < 10 tpy
000067-66-3	CHLOROFORM	> 0 but < 10 tpy
007440-47-3	CHROMIUM	> 0 but < 10 tpy
007440-48-4	COBALT	> 0 but < 10 tpy
001319-77-3	CRESYLIC ACID	>= 10 tpy
000156-62-7	CYANAMIDE, CALCIUM SALT (1:1)	> 0 but < 10 tpy
000057-12-5	CYANIDE	> 0 but < 10 tpy
156065-00-8	D45 SILOXANE	> 0 but < 2.5 tpy
003547-04-4	DDE	> 0 but < 10 tpy
000334-88-3	DIAZOMETHANE	> 0 but < 10 tpy
000132-64-9	DIBENZOFURAN	> 0 but < 10 tpy
000111-92-2	DIBUTYL AMINE	>= 25 tpy but < 40 tpy
000075-09-2	DICHLOROMETHANE	> 0 but < 10 tpy
000131-11-3	DIMETHYL PHTHALATE	> 0 but < 10 tpy
034590-94-8	DIPROPYLENE GLYCOL METHYL ETHER	> 0 but < 2.5 tpy
000074-84-0	ETHANE	> 0 but < 2.5 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO	> 0 but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO	> 0 but < 10 tpy
000075-34-3	ETHANE, 1,1-DICHLORO-	> 0 but < 10 tpy

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

000111-44-4	ETHANE, 1,1'-OXYBIS 2-CHLORO	> 0 but < 10 tpy
000106-93-4	ETHANE, 1,2-DIBROMO	> 0 but < 10 tpy
000075-00-3	ETHANE, CHLORO	> 0 but < 10 tpy
000067-72-1	ETHANE, HEXACHLORO	> 0 but < 10 tpy
000111-42-2	ETHANOL, 2,2'-IMINOBIS-	> 0 but < 10 tpy
000075-35-4	ETHENE, 1,1-DICHLORO	> 0 but < 10 tpy
000510-15-6	ETHYL 4,4'-DICHLOROBENZILATE	> 0 but < 10 tpy
000106-88-7	ETHYL OXIRANE	> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE	> 0 but < 10 tpy
000079-06-1	ETHYLENE CARBOXAMIDE	> 0 but < 10 tpy
000075-21-8	ETHYLENE OXIDE	> 0 but < 10 tpy
000096-45-7	ETHYLENE THIOUREA	> 0 but < 10 tpy
000151-56-4	ETHYLENEIMINE	> 0 but < 10 tpy
0NY075-20-0	FINE MINERAL FIBERS	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE	> 0 but < 10 tpy
000068-12-2	FORMAMIDE, N,N-DIMETHYL	> 0 but < 10 tpy
000076-44-8	HEPTACHLOR	> 0 but < 10 tpy
000118-74-1	HEXACHLORO BENZENE	> 0 but < 10 tpy
000087-68-3	HEXACHLOROBUTADIENE	> 0 but < 10 tpy
000077-47-4	HEXACHLOROCYCLOPENTADIENE	> 0 but < 10 tpy
000110-54-3	HEXANE	> 0 but < 10 tpy
000822-06-0	HEXANE, 1,6-DIISOCYANATO-	> 0 but < 10 tpy
000302-01-2	HYDRAZINE	> 0 but < 10 tpy
010035-10-6	HYDROGEN BROMIDE	>= 10 tpy but < 25 tpy
007647-01-0	HYDROGEN CHLORIDE	> 0 but < 10 tpy
007664-39-3	HYDROGEN FLUORIDE	> 0 but < 10 tpy
000122-66-7	HYRAZINE, 1,2 - DIPHENYL	> 0 but < 10 tpy
007439-92-1	LEAD	> 0 but < 10 tpy
000058-89-9	LINDANE, GAMMA	> 0 but < 10 tpy
007439-96-5	MANGANESE	> 0 but < 10 tpy
007439-97-6	MERCURY	> 0 but < 10 tpy
000062-75-9	METHANAMINE, N-METHYL-N-NITROSO	> 0 but < 10 tpy
000074-82-8	METHANE	>= 2.5 tpy but < 10 tpy
000542-88-1	METHANE, OXYBIS (CHLORO)	> 0 but < 10 tpy
000072-43-5	METHOXYCHLOR	> 0 but < 10 tpy
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER	> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL	>= 10 tpy
000074-83-9	METHYL BROMIDE	> 0 but < 10 tpy
000074-87-3	METHYL CHLORIDE	> 0 but < 10 tpy
000107-30-2	METHYL CHLOROMETHYLEETHER	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE	> 0 but < 10 tpy
000060-34-4	METHYL HYDRAZINE	> 0 but < 10 tpy
000074-88-4	METHYL IODIDE	> 0 but < 10 tpy
000624-83-9	METHYL ISOCYANATE	> 0 but < 10 tpy
001634-04-4	METHYL TERTBUTYL ETHER	> 0 but < 10 tpy
000101-68-8	METHYLENE BISPHENYL ISOCYANATE	> 0 but < 10 tpy
000121-44-8	N,N-DIETHYL ETHANAMINE	> 0 but < 10 tpy
004062-60-6	N,N-DI-TERT-BUTYL ETHYLENE DIAMINE	> 0 but < 2.5 tpy
000091-20-3	NAPHTHALENE	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	> 0 but < 10 tpy

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

000098-95-3	NITROBENZENE	> 0 but < 10 tpy
000059-89-2	NITROSOMORPHOLINE	> 0 but < 10 tpy
000684-93-5	NITROSO-N-METHYLUREA	> 0 but < 10 tpy
010024-97-2	NITROUS OXIDE	> 0 but < 2.5 tpy
000119-93-7	O-TOLIDINE	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 100 tpy but < 250 tpy
000106-89-8	OXIRANE, (CHLOROMETHYL)	> 0 but < 10 tpy
000092-67-1	P-AMINODIPHENYL	> 0 but < 10 tpy
000100-02-7	PARA-NITROPHENOL	> 0 but < 10 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy but < 75,000 tpy
000082-68-8	PENTACHLORONITROBEN ZENE	> 0 but < 10 tpy
000109-66-0	PENTANE	>= 2.5 tpy but < 10 tpy
000540-84-1	PENTANE, 2,2,4- TRIMETHYL-	> 0 but < 10 tpy
000127-18-4	PERCHLOROETHYLENE	> 0 but < 10 tpy
000108-95-2	PHENOL	>= 10 tpy
000534-52-1	PHENOL, 2-METHYL-4,6- DINITRO	> 0 but < 10 tpy
000108-39-4	PHENOL, 3-METHYL	> 0 but < 10 tpy
005613-46-7	PHENOL, 4,4'-(1- METHYLETHYLIDENE)BIS[ 2,6-DIMETHYL-	> 0 but < 2.5 tpy
000106-44-5	PHENOL, 4-METHYL	> 0 but < 10 tpy
001300-71-6	PHENOL, DIMETHYL-	>= 10 tpy but < 25 tpy
000087-86-5	PHENOL, PENTACHLORO	> 0 but < 10 tpy
000075-44-5	PHOSGENE	> 0 but < 10 tpy
007803-51-2	PHOSPHINE	> 0 but < 10 tpy
000062-73-7	PHOSPHORIC ACID, 2,2- DICHLOROETHENYL DIMETHYL ESTER	> 0 but < 10 tpy
000680-31-9	PHOSPHORIC TRIAMIDE, HEXAMETHYL	> 0 but < 10 tpy
000056-38-2	PHOSPHOROTHIOIC ACID, O,O-DIETHYL O-(4- NITROPHENYL) ESTER	> 0 but < 10 tpy
007723-14-0	PHOSPHORUS (YELLOW)	> 0 but < 10 tpy
0NY075-02-5	PM 2.5	>= 250 tpy but < 75,000 tpy
0NY075-00-5	PM-10	>= 250 tpy but < 75,000 tpy
025134-01-4	POLY(2,6-DIMETHYL-P- PHENYLENE OXIDE)	> 0 but < 2.5 tpy
001336-36-3	POLYCHLORINATED BIPHENYL	> 0 but < 10 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS	> 0 but < 10 tpy
009003-53-6	POLYSTYRENE	> 0 but < 2.5 tpy
000106-50-3	P-PHENYLENEDIAMINE	> 0 but < 10 tpy
000074-98-6	PROPANE	> 0 but < 2.5 tpy
001120-71-4	PROPANE SULTONE	> 0 but < 10 tpy
000096-12-8	PROPANE, 1,2-DIBROMO-3- CHLORO	> 0 but < 10 tpy
000078-87-5	PROPANE, 1,2-DICHLORO	> 0 but < 10 tpy
000075-56-9	PROPANE, 1,2-EPOXY-	> 0 but < 10 tpy
000079-46-9	PROPANE, 2-NITRO	> 0 but < 10 tpy
000107-13-1	PROPENENITRILE	> 0 but < 10 tpy
000123-38-6	PROPIONALDEHYDE	> 0 but < 10 tpy
000091-22-5	QUINOLINE	> 0 but < 10 tpy
000106-51-4	QUINONE	> 0 but < 10 tpy
010043-92-2	RADON	> 0 but < 10 tpy
007782-49-2	SELENIUM	> 0 but < 10 tpy
000100-42-5	STYRENE	>= 10 tpy
000096-09-3	STYRENE OXIDE	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy but < 75,000 tpy



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

000064-67-5	SULFURIC ACID, DIETHYL ESTER	> 0 but < 10 tpy
000077-78-1	SULFURIC ACID, DIMETHYL ESTER	> 0 but < 10 tpy
007550-45-0	TITANIUM TETRACHLORIDE	> 0 but < 10 tpy
000108-88-3	TOLUENE	>= 10 tpy
0NY100-00-0	TOTAL HAP	>= 250 tpy but < 75,000 tpy
008001-35-2	TOXAPHENE	> 0 but < 10 tpy
000079-01-6	TRICHLOROETHYLENE	> 0 but < 10 tpy
000095-95-4	TRICHLOROPHENOL, 2,4,5	> 0 but < 10 tpy
001582-09-8	TRIFLURALIN	> 0 but < 10 tpy
000527-60-6	TRIMETHYL PHENOL, 2,4,6-	>= 2.5 tpy but < 10 tpy
000593-60-2	VINYL BROMIDE	> 0 but < 10 tpy
000075-01-4	VINYL CHLORIDE	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 250 tpy but < 75,000 tpy
001330-20-7	XYLENE, M, O & P MIXT.	> 0 but < 10 tpy
000106-42-3	XYLENE, PARA-	> 0 but < 10 tpy
007440-66-6	ZINC	> 0 but < 2.5 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.



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

- 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)**



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

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 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



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

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	Regulation	Condition	Short Description
Facility/EU/EP/Process/ES			

-----

--

**New York State Department of Environmental Conservation  
Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

FACILITY	ECL 19-0301	160	Powers and Duties of the Department with respect to air
FACILITY	40CFR 61-FF.356 (a)	46	pollution control
FACILITY	40CFR 61-FF.356 (b) (1)	47	Benzene Emissions from Benzene waste operations - recordkeeping requirements
FACILITY	40CFR 61-FF.357 (b)	48	Benzene Emissions from Benzene waste operations - recordkeeping requirements
FACILITY	40CFR 61-M.145	44	Benzene Emissions from Benzene waste operations - reporting reqts
FACILITY	40CFR 61-M.150	45	Asbestos standards: standard for demolition and renovation
R-ESBLG/-/RPH/HS255	40CFR 63- DDDDD.7495 (a)	2 -6	Standard for waste disposal for manufacturing, fabricating, demolition, renovation and spraying operations
R-ESBLG/-/RPH/HS255	40CFR 63- DDDDD.7540 (a)	2 -7	ICI Boiler Major Source NESHAP - Compliance Date for New Sources
R-ESBLG/-/RPH/HS255	40CFR 63- DDDDD.7545 (c)	2 -8	ICI Boiler Major Source NESHAP - Continuous Compliance
R-ESBLG/-/RPH/HS255	40CFR 63-DDDDD.7565	2 -9	ICI Boiler Major Source NESHAP - New Source Notification
A-PAREA	40CFR 63-F.102 (a)	89	ICI Boiler Major Source NESHAP - General Provisions
A-PAREA	40CFR 63-F.103 (a)	90	Subpart F - HON NESHAP - general standards
A-PAREA	40CFR 63-F.103 (b) (1)	91	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions
A-PAREA	40CFR 63-F.103 (b) (5)	92	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions
A-PAREA	40CFR 63-F.103 (c) (1)	93	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

A-PAREA	40CFR 63-F.103 (c) (2)	94	provisions Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions
A-PAREA	40CFR 63-F.103 (d)	95	Subpart F - HON NESHAP - general compliance, reporting and recordkeeping provisions
A-PAREA/-/AFE/APHES	40CFR 63-F.104	96, 97, 98	Subpart F - HON NESHAP - heat exchange system requirements
A-PAREA/-/AFE/APHES	40CFR 63-F.104 (a) (1)	99	Subpart F - HON NESHAP - heat exchange system requirements
A-PAREA/-/AFE/APHES	40CFR 63-F.104 (a) (2)	100	Subpart F - HON NESHAP - heat exchange system requirements
A-PAREA/-/AFE/APMWW	40CFR 63-F.105	101	Subpart F - HON NESHAP - maintenance wastewater requirements
R-ESBLG	40CFR 63-FFFF.2450 (a)	137	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - General Requirements
R-ESBLG/-/RT5	40CFR 63- FFFF.2450 (c) (2)	146	Miscellaneous Organic Chemical Mfg NESHAP - Combined Emission Streams
R-ESBLG/00460/RT5	40CFR 63- FFFF.2450 (c) (2)	151	Miscellaneous Organic Chemical Mfg NESHAP - Combined Emission Streams
R-ESBLG/-/RT5	40CFR 63- FFFF.2450 (e) (1)	147	Miscellaneous Organic Chemical Mfg. NESHAP - Control Devices
FACILITY	40CFR 63-FFFF.2450 (k)	72	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Parameter Monitoring
R-ESBLG	40CFR 63-FFFF.2450 (l)	138	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Startup, Shutdown, and Malfunctions
R-ESBLG	40CFR 63-FFFF.2450 (m)	139	Miscellaneous Organic Chemical Mfg NESHAP - General reporting requirements
FACILITY	40CFR 63-FFFF.2450 (r)	73	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Surge control vessels and bottoms receivers



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 4-0122-00007/00719

Renewal Number: 1

Modification Number: 2 02/10/2015

FACILITY	40CFR 63-FFFF.2455 (a)	74	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Emission limits
FACILITY	40CFR 63-FFFF.2455 (b)	75	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Group 1 or TRE calculations
R-ESBLG/01365/RWS	40CFR 63-FFFF.2455 (c)	153	Misc. Organic NESHAP - Continuous Process Vent Requirements
FACILITY	40CFR 63-FFFF.2460 (a)	76, 2 -4	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Emission limits
FACILITY	40CFR 63-FFFF.2460 (b)	77, 2 -5	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status
R-ESBLG/-/RT6	40CFR 63-FFFF.2470 (a)	148	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tank Provisions
FACILITY	40CFR 63-FFFF.2470 (d)	78	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tanks - Planned Routine Maintenance
FACILITY	40CFR 63-FFFF.2475	79	Misc. Organic Chemical NESHAP
FACILITY	40CFR 63-FFFF.2480	80	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
FACILITY	40CFR 63-FFFF.2485	81	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
FACILITY	40CFR 63-FFFF.2490	82	Heat exchange system requirements
FACILITY	40CFR 63-FFFF.2520	83	Miscellaneous Organic Chemical Mfg NESHAP - Reporting
R-ESBLG	40CFR 63-FFFF.2525	140	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
R-ESBLG	40CFR 63-FFFF.2540	141	Miscellaneous Organic Chemical Mfg NESHAP - General Provisions
A-PAREA/01212	40CFR 63-G.113 (b)	111	Subpart G - HON NESHAP for Process

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

H-IPSBG	40CFR 63-G.113 (b)	120	Vents, Storage Vessels, etc-process vent provisions- reference control technology Subpart G - HON NESHAP for Process Vents, Storage Vessels, etc-process vent provisions- reference control technology
A-PAREA/01212	40CFR 63-G.113 (e)	112	Subpart G - HON NESHAP for Process Vents, Storage Vessels, etc-process vent provisions- reference control technology
A-PAREA/01212	40CFR 63-G.114 (d) (2)	113	Subpart G - HON NESHAP for Process Vents, Storage Vessels, etc-process vent provisions- monitoring requirements
A-PAREA/01212	40CFR 63-G.115 (d) (1)	114	HON NESHAP - provisions for process vents - calculation of TRE index value
A-PAREA/01212	40CFR 63- G.117 (a) (4) (ii)	115	HON NESHAP process vent provisions- reporting/recordkeepi ng rqts for group and TRE determinations and performance tests
A-PAREA/01212	40CFR 63-G.117 (b)	116	HON NESHAP process vent provisions- reporting/recordkeepi ng rqts for group and TRE determinations and performance tests
A-PAREA/01212	40CFR 63-G.118 (c)	117	HON NESHAP process vent provisions- periodic reporting and recordkeeping requirements
A-PAREA/01212	40CFR 63-G.118 (h)	118	HON NESHAP process vent provisions- periodic reporting and recordkeeping requirements
A-PAREA/-/AT4	40CFR 63-G.119 (e)	105	HON NESHAP - storage vessel provisions- reference control technology
A-PAREA/00282	40CFR 63-G.119 (e) (1)	110	HON NESHAP - storage vessel provisions- reference control technology
FACILITY	40CFR 63-G.123 (a)	49	HON NESHAP - storage vessel provisions - recordkeeping



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 4-0122-00007/00719

Renewal Number: 1

Modification Number: 2 02/10/2015

A-PAREA/-/AFE/APPWW	40CFR 63-G.132 (a) (3)	102	HON - process wastewater provisions - general
A-PAREA/-/AFE/APPWW	40CFR 63-G.146 (b) (2)	103	HON - process wastewater provisions - reporting
A-PAREA/-/AFE/APPWW	40CFR 63-G.147 (a)	104	HON - process wastewater provisions - recordkeeping
A-PAREA/-/AT4	40CFR 63-G.152 (c) (1)	106	General reporting and continuous records
A-PAREA/-/AT4	40CFR 63-G.152 (d) (1)	107	General reporting and continuous records
FACILITY	40CFR 63-GGGGG	84	Site Remediation NESHAP
FACILITY	40CFR 63-H.160	50	Subpart H - HON NESHAP for Equipment Leaks
FACILITY	40CFR 63-H.162	51	Subpart H - HON NESHAP for Equipment Leaks - standards:general
FACILITY	40CFR 63-H.163	52	Subpart H - HON NESHAP for Equipment Leaks - standards:pumps in light liquid service
FACILITY	40CFR 63- H.163 (b) (2) (ii)	53	Subpart H - HON NESHAP for Equipment Leaks - standards:pumps in light liquid service
FACILITY	40CFR 63-H.164	54	Subpart H - HON NESHAP for Equipment Leaks - standards:compressors
FACILITY	40CFR 63-H.165	55	Subpart H - HON NESHAP for Equipment Leaks - standards:pressure relief devices in gas/vapor service
FACILITY	40CFR 63-H.166	56	Subpart H - HON NESHAP for Equipment Leaks - standards:sampling connection systems
FACILITY	40CFR 63-H.167	57	Subpart H - HON NESHAP for Equipment Leaks - standards:open-ended valves or lines
FACILITY	40CFR 63-H.168	58	Subpart H - HON NESHAP for Equipment Leaks - standards:valves in gas/ vapor and in light liquid service
FACILITY	40CFR 63-H.169	59	Subpart H - HON NESHAP for Equipment Leaks - standards:pumps, valves, connectors, agitators

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

FACILITY	40CFR 63-H.170	60	heavy liquid service, instruments Subpart H - HON NESHAP for Equipment Leaks - standards:surge control vessels and bottoms receivers
FACILITY	40CFR 63-H.171	61	Subpart H - HON NESHAP for Equipment Leaks - standards:delay of repair
FACILITY	40CFR 63-H.172	62	Subpart H - HON NESHAP for Equipment Leaks - standards:closed-vent systems and control devices
FACILITY	40CFR 63-H.173	63	Subpart H - HON NESHAP for Equipment Leaks - standards:agitators in gas/ vapor service and in light liquid service
FACILITY	40CFR 63-H.174	64	Subpart H - HON NESHAP for Equipment Leaks - standards:connectors in gas/vapor service and in light liquid service
FACILITY	40CFR 63-H.180	65	Subpart H - HON NESHAP for Equipment Leaks - test methods and procedures
FACILITY	40CFR 63-H.181	66, 67	Subpart H - HON NESHAP for Equipment Leaks - recordkeeping requirements
FACILITY	40CFR 63-H.182	68, 69	Subpart H - HON NESHAP for Equipment Leaks - reporting requirements
H-IPSBG	40CFR 63-JJJ.1311(f)	121	Subpart JJJ - NESHAP for Polymers and Resins IV - Butadiene Resins, PET
H-IPSBG/-/HFE	40CFR 63-JJJ.1311(o)	128	Polymers and Resins IV - compliance schedule - definition of time intervals
H-IPSBG	40CFR 63-JJJ.1313(a)	122	Polymers and Resins IV - Emission Standards
H-IPSBG/-/HPV	40CFR 63-JJJ.1315	131	Continuous Process Vents Provisions
H-IPSBG/-/HPV	40CFR 63-JJJ.1316	132	Group IV Polymers and Resins - PET and polystyrene continuous process affected sources - emissions control

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

H-IPSBG	40CFR 63-JJJ.1317	123	provisions Polymers and Resins IV - PET and polystyrene continuous process affected sources - monitoring provisions
H-IPSBG	40CFR 63-JJJ.1319(a)	124	Polymers and Resins IV - Polystyrene affected sources, recordkeeping provisions
H-IPSBG	40CFR 63-JJJ.1320(a)	125	Polymers and Resins IV - Reporting provisions for polystyrene affected sources
H-IPSBG/-/HFE/H-HES	40CFR 63-JJJ.1328	130	Heat exchange systems provisions
H-IPSBG/-/HFE	40CFR 63-JJJ.1331	129	POLYMERS & RESINS IV -
H-IPSBG	40CFR 63-JJJ.1335	126	Polymers and Resins IV - Recordkeeping and reporting provisions
H-IPSBG	40CFR 63- JJJ.1335(e) (6)	127	Periodic Reports
FACILITY	40CFR 63-SS.982 (c)	2 -1	National Emission Standards for Closed Vent Systems - Requirements for Closed Vent Systems and Nonflare Control Device
R-ESBLG/-/RT5	40CFR 63-SS.982 (c)	143	National Emission Standards for Closed Vent Systems - Requirements for Closed Vent Systems and Nonflare Control Device
FACILITY	40CFR 63-SS.982 (d)	70	NESHAP for Closed Vent Systems - Routing to a Fuel Gas System or Process
FACILITY	40CFR 63-SS.982 (e)	71	NESHAP for Closed Vent Systems - Final Recovery Devices
R-ESBLG/-/RT5	40CFR 63-SS.983	144	GMACT - Closed Vent Systems requirements
R-ESBLG/-/RT5	40CFR 63-SS.985	145	GMACT - Requirements for nonflare control devices controlling emissions from storage tanks & low throughput transfer racks
FACILITY	40CFR 63-SS.990 (b)	2 -2	NESHAP For Closed Vent Systems, Control Devices, etc. - Absorbers & Condensers as Control Devices - performance testing



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

FACILITY	40CFR 63-SS.990 (c) (2)	2 -3	NESHAP for Closed Vent Systems, Control Devices, etc. - Absorbers, Condensers as Control
R-ESBLG	40CFR 63-SS.996	134	GMACT - General monitoring requirements for control and recovery devices
R-ESBLG	40CFR 63-SS.998	135	GMACT - Recordkeeping requirements for closed vent systems, control devices, recovery devices, and routing to fuel gas system
R-ESBLG	40CFR 63-SS.999	136	GMACT - Notifications and other reports
FACILITY	40CFR 63-ZZZZ	1 -15	Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	1 -55	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	1 -6	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	1 -7	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	1 -8	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 87, 88	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	1 -9	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	1 -1	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (a) (8)	1 -10	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c)	1 -2	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4 (c) (2)	1 -3	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4 (c) (3) (ii)	1 -4	Reporting Requirements - Deviations and

New York State Department of Environmental Conservation  
**Permit Review Report**



**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

FACILITY	6NYCRR 201-6.4 (d) (4)	1	-12	Noncompliance
FACILITY	6NYCRR 201-6.4 (e)	1	-5	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (f) (6)	1	-11	Compliance Certification
FACILITY	6NYCRR 201-6.5 (f)	24,	25	Off Permit Changes Operational flexibility
FACILITY	6NYCRR 202-1.1	18		Required emissions tests.
FACILITY	6NYCRR 202-2.1	6		Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	7		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	1	-13	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	1	-56	General Prohibitions - visible emissions limited.
A-PAREA/-/HOF	6NYCRR 212.10 (c)	109		NOx and VOC RACT required at major facilities
A- PAREA/01252/AT5/M305B	6NYCRR 212.10 (c)	119		NOx and VOC RACT required at major facilities
H-IPSBG/-/HT3	6NYCRR 212.10 (c)	133		NOx and VOC RACT required at major facilities
R-ESBLG/-/RWS	6NYCRR 212.10 (c)	149		NOx and VOC RACT required at major facilities
R- ESBLG/00306/RT2/00306	6NYCRR 212.10 (c) (1)	150		NOx and VOC RACT required at major facilities
R- ESBLG/01305/RT2/RM606	6NYCRR 212.10 (c) (1)	152		NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 212.11 (b)	28		Sampling and monitoring
FACILITY	6NYCRR 212.4 (a)	26		General Process Emission Sources - emissions from new sources and/or modifications
R-ESBLG/-/RRX	6NYCRR 212.4 (a)	142		General Process Emission Sources - emissions from new sources and/or modifications
R- ESBLG/01365/RWS/IVSMS	6NYCRR 212.4 (a)	154,	155	General Process Emission Sources - emissions from new sources and/or modifications
R- ESBLG/01366/RPV/01366	6NYCRR 212.4 (a)	156		General Process Emission Sources - emissions from new sources and/or modifications
R- ESBLG/01379/RT4/T1379	6NYCRR 212.4 (a)	157		General Process Emission Sources - emissions from new



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

S-FSBLG/-/FEX/C2581	6NYCRR 212.4 (a)	158	sources and/or modifications General Process Emission Sources - emissions from new sources and/or modifications
S-FSBLG/-/FEX/C2593	6NYCRR 212.4 (a)	159	General Process Emission Sources - emissions from new sources and/or modifications
FACILITY	6NYCRR 212.4 (c)	27	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 215.2	8	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (f)	1 -14	Sulfur-in-Fuel Limitations
A-PAREA/-/AT4/MF150	6NYCRR 229.3 (e) (1)	108	Volatile organic liquid storage tanks
FACILITY	6NYCRR 229.3 (e) (2) (iv)	31	Volatile organic liquid storage tanks
FACILITY	6NYCRR 229.3 (e) (2) (v)	32	Volatile organic liquid storage tanks
R- ESBLG/00461/RT1/RM609	6NYCRR 229.3 (e) (2) (v)	2 -10	Volatile organic liquid storage tanks
FACILITY	6NYCRR 236.2 (c)	34	Applicability.
FACILITY	6NYCRR 236.3 (a)	35	Control requirements.
FACILITY	6NYCRR 236.3 (c)	33	Control requirements.
FACILITY	6NYCRR 236.4 (b)	36	Repair requirements.
FACILITY	6NYCRR 236.4 (c)	37	Repair requirements.
FACILITY	6NYCRR 236.5	38, 39, 40, 41, 42	Recordkeeping and reporting requirements.
FACILITY	6NYCRR 236.7	43	Monitoring.

**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



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

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)



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

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



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

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

40 CFR Part 82, Subpart F

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

**Facility Specific Requirements**

In addition to Title V, SABIC INNOVATIVE PLASTICS US LLC has been determined to be subject to the following regulations:

40 CFR 61.145

This regulation describes proper disposal procedures for asbestos at facility.

40 CFR 61.150

This regulation states that the facility must properly dispose of asbestos at facility.

40 CFR 61.356 (a)

This requirement states that the facility must keep records in accordance with the rule for two years.

40 CFR 61.356 (b) (1)

This regulation states that the facility must keep records for test results, measurements, calculations, and other documentation used to determine other characteristics of the benzene waste stream.

40 CFR 61.357 (b)

This rule states that what the facility must submit to the administrator when the annual benzene quantity from facility waste is less than 1Mg/year and what the facility must submit to the administrator if there is a change in that amount above 1Mg/year.

40 CFR 63.102 (a)

This condition specifies how the HON rule applies to the facility during times of startup, shutdown, and malfunctions. The HON rule does not apply during these periods, but if it is still within the facility's ability to comply despite the startup, shutdown, or malfunction, the facility shall comply with the rule. The facility shall also take all measures possible to reduce the emissions of hazardous air pollutants during startups, shutdowns, and malfunctions.

40 CFR 63.103 (a)



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

This condition specifies which parts of the General Provisions in 40CFR63, Subpart A apply to facilities subject to the HON and which parts do not apply. The General Provisions include provisions on reporting, recordkeeping, monitoring, performance testing, compliance extension provisions, etc.

40 CFR 63.103 (b) (1)

This condition establishes the schedule and procedures under which the facility is to perform their stack tests to determine compliance with the HON rule. This condition refers to §63.7(a) for the default schedule and procedures, which basically gives the facility 180 days after the compliance date to perform their stack test.

40 CFR 63.103 (b) (5)

This condition allows the facility to waive any stack test required in the HON rule if the New York State DEC approves of it. The facility would need to justify why the performance test needs to be waived (ie, excessive cost, impractical to do, etc.)

40 CFR 63.103 (c) (1)

In order to make inspections easier, this condition requires the facility to keep any records required by the HON rule for at least five years. Furthermore, the latest 6 months of records need to be kept on site either on a computer or accessible within 2 hours.

40 CFR 63.103 (c) (2)

This condition specifies certain records which must always be kept for any unit subject to the HON rule. These records include information about any startups, shutdowns, and malfunctions of the unit or the monitoring equipment. Records must also be kept of whether the startup, shutdown, and malfunction plan was followed. In addition, this condition requires the facility to keep records proving that any equipment used to continuously monitor emissions for the HON rule has been calibrated and maintained. Having these records will demonstrate to inspectors that the facility has been complying with the provisions in the HON rule on an ongoing basis.

40 CFR 63.103 (d)

This condition explains how and where to send in all of their reports.

40 CFR 63.104

If there are heat exchangers in a process unit that is subject to the Hazardous Organic NESHAP rule, the facility must monitor the heat exchangers for leaks in order to prevent organic hazardous air pollutants from entering the coolant water supply. The facility can choose to either monitor the cooling water directly or measure some other parameter that would indicate a leak in the heat exchange equipment.

40 CFR 63.104 (a) (1)

This condition states that if the pressure in the cooling water is greater than the pressure in the process fluid, then the facility does not need to check for leaks of organic hazardous air pollutants in the heat exchanger equipment.

40 CFR 63.104 (a) (2)

This condition relieves the facility from needing to check the coolant fluid for leaks of organic hazardous air pollutants as long as there is another fluid in between the coolant and the process fluids.

40 CFR 63.105

This condition requires that the facility prepare a plan on how to manage the wastewater containing organic hazardous air pollutants that is generated during process unit maintenance or shutdown. This plan should include every task that creates this type of wastewater and how best to handle the water to



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

minimize the amount of organic hazardous air pollutants that get released to the atmosphere.

40 CFR 63.113 (b)

This condition controls the emissions of hazardous air pollutants by requiring that if the facility is controlling emissions of the gas stream by using a process heater or a boiler, then the stream must be introduced into the flame zone. This helps to ensure complete combustion within the boiler/process heater and therefore minimizes the amount of hazardous air pollutants that could escape to the atmosphere.

40 CFR 63.113 (e)

This condition provides an incentive for the facility to reduce the organic hazardous air pollutant emissions from the process vents by calculating a value (TRE index value) and trying to maintain the value above 4. The TRE index value is based on operating parameters such as heating value and flow rate of the gas stream, and the concentration of organic compounds. If the value stays above 4, the facility will only need to keep records and submit reports proving that the TRE has stayed above 4.

40 CFR 63.114 (d) (2)

This condition reduces the emissions of hazardous air pollutants by requiring that the facility keeps closed any lines that could bypass any control devices. These bypass lines must be closed with a carseal or lock-and-key type configuration, and these shut-off mechanisms must be visually inspected on a monthly basis to make sure the bypass lines remain closed.

40 CFR 63.115 (d) (1)

This condition specifies the method the facility will use to calculate the TRE index value. The TRE index value is a parameter that is used to reflect the amount of organic hazardous air pollutants being emitted from a process vent. A higher TRE index value represents a lower rate of emissions of organic hazardous air pollutants. This condition in particular allows the facility to use an engineering assessment which includes test results, permit limits, and design analyses to determine the variables used in the calculation.

40 CFR 63.117 (a) (4) (iii)

This condition requires the facility to keep a description of where the process vent stream enters the boiler or process heater in order to ensure that the facility is in compliance with the hazardous air pollutant reduction requirements for process vents.

40 CFR 63.117 (b)

This condition specifies the amount of paperwork that is required of a facility with process vents emitting a low amount of organic hazardous air pollutants. The paperwork that is required includes all parts of an engineering assessment (measurements, calculations, etc.) performed in order to calculate the TRE index value. The TRE index value is a number which indicates the level of control and recordkeeping needed to comply with the HON rule.

40 CFR 63.118 (c)

If the facility chooses to maintain a TRE index value high enough to be in compliance with the HON rule, this condition requires the facility to keep records of any process changes and recalculations of the TRE index value. This will prove that the facility has always had a TRE index value high enough to keep emissions of organic hazardous air pollutants at a low level.

40 CFR 63.118 (h)

This condition requires that if the TRE index value falls below 4, a report needs to be submitted on a timely basis showing why the TRE index value changed, what the new TRE index value is, and that the



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

facility will comply with the new requirements that are required due to the new TRE index value. Having the TRE index value above 4 indicates that the facility's value is high enough to keep emissions of organic hazardous air pollutants at a low level.

40 CFR 63.119 (e)

In order to reduce the emissions of organic hazardous air pollutants from storage vessels, a facility may elect to install a system that routes all of the emissions from the storage vessel to a control device. This condition requires that the control device reduces the organic hazardous air pollutants in this captured stream by 90-95% depending on when the control device was installed.

40 CFR 63.119 (e) (1)

This condition states that a storage vessel shall be designed to reduce inlet emissions to 95% or greater control for hazardous air pollutants.

40 CFR 63.123 (a)

This condition requires the facility to keep a record of the dimensions and the capacity of any storage vessel that is subject to the HON rule.

40 CFR 63.1311 (f)

This regulation requires the owners or operators of affected sources subject to 40CFR63 Subpart JJJ to comply with the requirements of Subpart A of Part 63. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

40 CFR 63.1311 (o)

This condition clarifies the time periods in which the facility may comply with the provisions of Subpart JJJ. Subpart JJJ contains many requirements that must be done on a periodic basis (for example, the quarterly leak detection monitoring for valves). This condition specifies that the quarterly monitoring must occur according to a calendar quarter (January 1 - March 31) as opposed to starting on some date in the middle of the first month.

40 CFR 63.1313 (a)

This condition specifies which sections of subpart JJJ apply to each specific type of process equipment.

40 CFR 63.1315

This condition reduces the amount of hazardous air pollutants (HAPs) being emitted to the atmosphere by requiring certain controls on process vents that are subject to subpart JJJ of 40CFR63. This condition requires the facility to comply with the provisions for process vents contained in sections §63.113 through §63.118 of subpart G.

These provisions in subpart G require the facility to determine the level of emissions from each process vent by calculating a total resource efficiency index value (TRE) for each vent. If the TRE is below a certain level, then the facility is required to use air pollution control equipment to either reduce the emissions by a certain percentage or to an emission standard of 20 ppm. These provisions also require monitoring, recordkeeping, and reporting to ensure compliance with the process vent standards.

40 CFR 63.1316

This condition states the control requirements for resin and polymer operations.

40 CFR 63.1317



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

This condition requires that any facility with a continuous process vent that is using a control device to comply with the provisions of subpart JJJ shall monitor the control device according to the provisions in subpart G. The provisions in subpart G require specific parameters to be monitored depending on the type of air pollution control equipment that is used to reduce the emissions of hazardous air pollutants. For example, if the facility uses a flare to burn any HAPs that are emitted from a continuous process vent, then this condition requires them to monitor the flare using a thermocouple to ensure that the temperature is high enough to indicate that the flame inside the flare is in operation.

40 CFR 63.1319 (a)

This condition requires that any facility subject to the provisions for continuous processes producing polystyrene and PET shall comply with the recordkeeping requirements listed for process vents in §63.114 through §63.118 of subpart G. These provisions require the facility to keep records of the values that are required to determine whether the air pollution control equipment are operating and are reducing the level of emissions of hazardous air pollutants.

40 CFR 63.132 (a) (3)

According to this condition, the facility must keep certain records for wastewater streams that are not considered a high risk of hazardous air pollutant emissions. These records will ensure that the stream(s) remain a minor source of emissions and are subject to verification by the New York State DEC.

40 CFR 63.1320 (a)

This condition requires that any facility subject to the provisions for continuous processes producing polystyrene and PET shall comply with the reporting requirements listed for process vents in §63.114 through §63.118 of subpart G. These provisions require the facility to submit reports to the New York State DEC describing whether the facility is reducing the emissions of hazardous air pollutants and complying with the appropriate provisions in subpart JJJ.

40 CFR 63.1328

This regulation details the requirements for heat exchange systems at facilities subject to the requirements of 40 CFR 63 Subpart JJJ.

40 CFR 63.1331

These conditions detail the leak detection and repair program that is required under 40CFR63, Subpart JJJ. The facility will be required to periodically monitor each type of equipment for leaking of any organic hazardous air pollutant, and repair them on a timely basis. Records will also need to be kept indicating which equipment leaked and detailing information about the repair of the leaks. Reports will also be required listing which monitoring and repairs took place.

40 CFR 63.1335

This condition specifies what records the facility needs to keep and what reports need to be sent in order to demonstrate compliance with the requirements of subpart JJJ. Records that need to be kept include, but are not limited to, the values of the monitored parameters and start-up/shutdown/malfunction records. Reports include, but are not limited to, the Notification of Compliance Status report and semi-annual periodic reports.

40 CFR 63.1335 (e) (6)

This regulation requires the source owner or operator to submit periodic reports as specified in paragraphs (e)(6)(i) through (e)(6)(xi) of 40 CFR 63 Subpart JJJ-1335.

40 CFR 63.146 (b) (2)



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

This condition specifies the information that the facility needs to report in their Notification of Compliance Status Report concerning their process wastewater streams. This information shall be reported within 150 days of the facility's compliance date and shall identify each stream and list such information as the flowrate, concentration of organic hazardous air pollutants, intended compliance approach, etc.

40 CFR 63.147 (a)

This condition requires the facility to notify the wastewater treatment plant operator of the presence of organic HAPs if a contaminated wastewater stream is transferred to an off-site wastewater plant.

40 CFR 63.152 (c) (1)

This condition requires the facility to submit periodic reports on a semiannual basis starting at a specified number of days after the Notification of Compliance report is due.

40 CFR 63.152 (d) (1)

This condition requires the facility to submit reports of startups, shutdowns, and malfunctions that occur during each 6-month period.

40 CFR 63.160

This section of the Equipment Leaks portion of the Hazardous Organic NESHAP rule describes the types of equipment subject to the rule and types that are exempt. It also describes how overlap with other federal regulations are handled.

40 CFR 63.162

This section of the Equipment Leaks rule describes the general standards that apply regardless of equipment type. Other sections contain standards specific to a given type of equipment (e.g., pumps in light liquid service).

40 CFR 63.163

This section of the Equipment Leaks rule describes the standards for pumps in light liquid service. Since the individual pumps at the facility are not listed in the permit but are contained in on-site logs or descriptions, the types of pumps that are exempt are listed in the permit for clarity.

40 CFR 63.163 (b) (2) (iii) ('A')

40 CFR 63.164

This section of the Equipment Leaks rule describes the leak detection and repair standards for compressors. It describes the seal systems and sensors required as well as specific exemptions.

40 CFR 63.165

This section of the Equipment Leaks rule includes the standards for pressure relief devices in gas or vapor service. These devices are designed to prevent overpressurization of tanks, reactors, etc. When one releases, it must be manually reset to a defined sealed position in a specified period of time.



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

40 CFR 63.166

This condition reduces the emissions of hazardous air pollutants by requiring the facility to install sampling connection systems in such a way that the sampling system is either closed or disposed of in an approved method.

40 CFR 63.167

40 CFR 63.168

This section of the Equipment Leaks rule provides the monitoring schedule for valves in gas/vapor or light liquid service as well as the leak definition, and method for calculating of percent leaking valves. The percent leaking valves determines which schedule to use and may trigger a quality improvement program.

40 CFR 63.169

This condition reduces the emissions of organic hazardous air pollutants by requiring the facility to periodically check for leaks on various types of equipment. The facility must check for physical evidence of a leak on any pumps, connectors, agitators, or valves that are in contact with process streams that are mostly in the liquid phase. If evidence of a leak is found, then further testing is required to determine if the leak is bad enough to call for repair. Records must be kept and reports must be submitted in order to verify compliance with this condition.

40 CFR 63.170

This condition reduces the escape of hazardous air pollutants to the atmosphere from bottoms receivers and surge control vessels at the facility. This condition requires the facility to enclose these pieces of equipment and send the emissions to a control device or recover the HAP's that may escape.

40 CFR 63.171

40 CFR 63.172

40 CFR 63.173

This section of the Equipment Leaks rule provides the leak monitoring schedule, leak definition, repair standards and exemptions for agitators in gas/vapor or light liquid service.

40 CFR 63.174



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

40 CFR 63.180

This regulation specifies the test methods and procedures to be used to determine compliance with 40 CFR 63 Subpart H.

40 CFR 63.181

40 CFR 63.182

40 CFR 63.2450 (a)

This condition states that the facility must be in compliance with emission limits and work practice standards in tables 1 - 7 of this regulation except during period of startup, shutdown, and malfunction.

40 CFR 63.2450 (c) (2)

This regulation states that the facility must determine the applicable requirements based on what type of process vent it is.

40 CFR 63.2450 (e) (1)

This requirement states that for emissions vented through a closed vent system you must meet the requirements in 40 CFR 63.982(c) and the requirements referenced therein.

40 CFR 63.2450 (k)

This condition states the requirements for a continuous parameter monitoring system.

40 CFR 63.2450 (l)

This condition states that during periods of startup, shutdown, malfunction excludes the monitoring data from the daily averages.

40 CFR 63.2450 (m)

This condition states what information must be included in the compliance report.

40 CFR 63.2450 (r)

This condition states for Group 1 storage tanks you must meet the emission requirements and work practice standards in table 4 of this subpart.

40 CFR 63.2455 (a)

This condition states for continuous process vents the facility must meet the requirements in Table 1 of this subpart.

40 CFR 63.2455 (b)

This condition states for each continuous process vent the facility must designate whether it is a Group 1 process vent or determine the Total Resource Effectiveness except as specified in paragraphs b(1) through (3) of this section.

40 CFR 63.2455 (c)



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

This condition states if you use a recovery device you must meet the requirements of 40 CFR 63.982(e) and requirements referenced therein, except as specified in 40 CFR 63.2450 and paragraphs (c)(1) of this section.

40 CFR 63.2460 (a)

40 CFR 63.2460 (b)

40 CFR 63.2470 (a)

This condition involves the emission limits that are imposed on the facility for storage tanks and the emission limit is specified in Table 4 of this subpart.

40 CFR 63.2470 (d)

The condition states that during planned routine maintenance the facility must limit the hours in which the control device does not meet the requirements of Table 4.

40 CFR 63.2475

These conditions state the requirement the facility must meet for their transfer racks.

40 CFR 63.2480

These conditions state the requirement the facility must meet for equipment leaks.

40 CFR 63.2485

These conditions state what requirements the facility must meet for wastewater streams and liquid streams in open systems within an MCPU.

40 CFR 63.2490

This condition states the requirements for heat exchange systems and that the facility must comply with Table 10 to this subpart.

40 CFR 63.2520

This regulation states when the reports are due for the facility in order to be in compliance with Miscellaneous Organic NESHAP regulations.

40 CFR 63.2525

This condition specifies what records the facility must keep.

40 CFR 63.2540

This condition states the General Provisions that apply to the facility for 40 CFR 63.

40 CFR 63.7495 (a)

40 CFR 63.7540 (a)

This condition states how to demonstrate continuous compliance with emission limits, work practice standards, and operating limits.



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

40 CFR 63.7545 (c)

40 CFR 63.7565

40 CFR 63.982 (c)

40 CFR 63.982 (d)

Owners that route emissions to a fuel gas system or a process shall meet the requirements stated in this condition.

40 CFR 63.982 (e)

This condition states that the facility that uses a final recovery device must comply with monitoring, recordkeeping, and reporting requirements stated in the rule.

40 CFR 63.983

The rule explains the requirements for closed vent systems.

40 CFR 63.985

This rule explains the requirements for venting storage tanks.

40 CFR 63.990 (b)

40 CFR 63.990 (c) (2)

40 CFR 63.996

40 CFR 63.998

This condition states the records that need to be retained to be in compliance with this subpart.

40 CFR 63.999

This condition states the notifications and other reports that need to be submitted to be in compliance with this subpart.

40 CFR Part 63, Subpart GGGGG

This regulation was added in the case that if any non-exempt remediation work is done at the SABIC site that this rule and all of its parts would apply.



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

40 CFR Part 63, Subpart ZZZZ

6 NYCRR 201-6.5 (f)

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

6 NYCRR 211.1

6 NYCRR 212.10 (c)

This regulations sets forth the requirements for reasonably available control technology (RACT) and RACT compliance plans for facilities that are major sources of oxides of nitrogen or volatile organic compounds.

6 NYCRR 212.10 (c) (1)

Reasonably available control technology compliance plans for major facilities. The compliance plan must identify reasonably available control technology (RACT) for each emission point which emits nitrogen oxides for major nitrogen oxide facilities or volatile organic compounds for major volatile organic compound facilities. The compliance plan must identify the emission points which do not employ reasonably available control technology (RACT), and a schedule for implementation of RACT must be included in the plan.

6 NYCRR 212.11 (b)

The facility is subject to volatile organic compounds reasonable available control technology they will monitor the control devices so that they maintain the proper control at the facility.

6 NYCRR 212.4 (a)

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 225-1.2 (f)

Sulfur-in-fuel limitations for the purchase of #2 heating oil on or after July 1, 2012.

6 NYCRR 229.3 (e) (1)

For a fixed roof tank storing volatile organic compounds the facility will control emissions by installing an internal floating roof or other equivalent control.

6 NYCRR 229.3 (e) (2) (iv)

This section requires a tank with submerged fill for storage of volatile organic liquids



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 4-0122-00007/00719

Renewal Number: 1

Modification Number: 2 02/10/2015

6 NYCRR 229.3 (e) (2) (v)

6 NYCRR 236.2 (c)

6 NYCRR 236.3 (a)

This condition requires synthetic organic chemical manufacturing facilities to monitor (using EPA Method 21) certain process components for leaks of volatile organic compounds on a quarterly schedule.

6 NYCRR 236.3 (c)

This condition outlines variations from the typical quarterly leak detection and repair schedule for certain types of synthetic organic chemical manufacturing components.

6 NYCRR 236.4 (b)

This condition requires repairs to be performed on leaking components at synthetic organic chemical mfg. facilities. This section of the regulation also limits the time in which the repairs must be completed and the circumstances for delaying the repairs

6 NYCRR 236.4 (c)

This condition requires repairs to be performed on leaking components at synthetic organic chemical mfg. facilities. This section of the regulation also limits the time in which the repairs must be completed and the circumstances for delaying the repairs

6 NYCRR 236.5

Conditions under section 236.5 detail the recordkeeping and reporting requirements of the process unit component leak detection and repair program. This includes an maintaining an onsite inspection log for two years and submitting quarterly reports.

6 NYCRR 236.7

This citation explains the method that is to be used while conducting the leak detection and repair program -- EPA Method 21.

**Compliance Certification**

**Summary of monitoring activities at SABIC INNOVATIVE PLASTICS US LLC:**

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
---		



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 4-0122-00007/00719

Renewal Number: 1

Modification Number: 2 02/10/2015

FACILITY	47	record keeping/maintenance procedures
FACILITY	48	record keeping/maintenance procedures
R-ESBLG/-/RPH/HS255	2-6	record keeping/maintenance procedures
R-ESBLG/-/RPH/HS255	2-7	record keeping/maintenance procedures
A-PAREA	94	record keeping/maintenance procedures
A-PAREA/-/AFE/APHES	98	work practice involving specific operations
A-PAREA/-/AFE/APMWW	101	record keeping/maintenance procedures
R-ESBLG/00460/RT5	151	monitoring of process or control device parameters as surrogate
FACILITY	72	record keeping/maintenance procedures
FACILITY	74	record keeping/maintenance procedures
FACILITY	75	record keeping/maintenance procedures
R-ESBLG/01365/RWS	153	monitoring of process or control device parameters as surrogate
FACILITY	2-4	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
FACILITY	2-5	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
R-ESBLG/-/RT6	148	record keeping/maintenance procedures
FACILITY	78	record keeping/maintenance procedures
FACILITY	79	record keeping/maintenance procedures
FACILITY	80	record keeping/maintenance procedures
FACILITY	81	record keeping/maintenance procedures
FACILITY	82	record keeping/maintenance procedures
FACILITY	83	record keeping/maintenance procedures
R-ESBLG	140	record keeping/maintenance procedures
A-PAREA/01212	113	record keeping/maintenance procedures
A-PAREA/01212	114	record keeping/maintenance procedures
A-PAREA/01212	115	record keeping/maintenance procedures
A-PAREA/01212	116	record keeping/maintenance procedures
A-PAREA/01212	117	record keeping/maintenance procedures
A-PAREA/01212	118	record keeping/maintenance procedures
A-PAREA/-/AT4	105	intermittent emission testing
A-PAREA/00282	110	monitoring of process or control device parameters as surrogate
FACILITY	49	record keeping/maintenance procedures
A-PAREA/-/AFE/APPWW	102	record keeping/maintenance procedures
A-PAREA/-/AT4	107	record keeping/maintenance procedures
FACILITY	84	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	record keeping/maintenance procedures
FACILITY	61	record keeping/maintenance procedures
FACILITY	62	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
FACILITY	68	record keeping/maintenance procedures
FACILITY	69	record keeping/maintenance procedures
H-IPSBG/-/HFE	128	record keeping/maintenance procedures
H-IPSBG/-/HPV	132	record keeping/maintenance procedures
H-IPSBG/-/HFE	129	record keeping/maintenance procedures
H-IPSBG	126	record keeping/maintenance procedures



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

FACILITY	2-1	record keeping/maintenance procedures
FACILITY	70	record keeping/maintenance procedures
FACILITY	71	record keeping/maintenance procedures
R-ESBLG/-/RT5	144	record keeping/maintenance procedures
R-ESBLG/-/RT5	145	record keeping/maintenance procedures
FACILITY	2-2	record keeping/maintenance procedures
FACILITY	2-3	monitoring of process or control device parameters as surrogate
R-ESBLG	134	record keeping/maintenance procedures
R-ESBLG	135	record keeping/maintenance procedures
R-ESBLG	136	record keeping/maintenance procedures
FACILITY	1-4	record keeping/maintenance procedures
FACILITY	1-5	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
A-PAREA/-/HOF	109	record keeping/maintenance procedures
A-PAREA/01252/AT5/M305B	119	monitoring of process or control device parameters as surrogate
H-IPSBG/-/HT3	133	intermittent emission testing
R-ESBLG/-/RWS	149	continuous emission monitoring (cem)
R-ESBLG/00306/RT2/00306	150	monitoring of process or control device parameters as surrogate
R-ESBLG/01305/RT2/RM606	152	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	26	continuous emission monitoring (cem)
R-ESBLG/-/RRX	142	continuous emission monitoring (cem)
R-ESBLG/01365/RWS/IVSMS	154	continuous emission monitoring (cem)
R-ESBLG/01365/RWS/IVSMS	155	continuous emission monitoring (cem)
R-ESBLG/01366/RPV/01366	156	continuous emission monitoring (cem)
R-ESBLG/01379/RT4/T1379	157	monitoring of process or control device parameters as surrogate
S-FSBLG/-/FEX/C2581	158	work practice involving specific operations
S-FSBLG/-/FEX/C2593	159	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	1-14	work practice involving specific operations
FACILITY	33	record keeping/maintenance procedures

----

**Basis for Monitoring**

6 NYCRR 215.2

Open burning regulation.

6 NYCRR Part 215 was recently revised (filed on 9/14/2009) and the new version has been submitted to USEPA for inclusion in the New York State Implementation Plan (SIP) as a control measure for PM2.5. Until USEPA approves the SIP revision, the original version of the rule is federally enforceable whereas the new version is state enforceable only. The new rule has been placed on the federal side of the permit pending approval, however the rule is not federally enforceable until such a date when the US EPA approves the most recent submission of the New York State Implementation Plan.

6 NYCRR 212.4(c)

Emission Unit: A-PAREA    Process: ASH  
Emission Unit: C-XPRSS    Emission Point: 05004  
Emission Unit: C-XPRSS    Emission Point: 05005



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

Emission Unit: S-FSBLG Emission Point: 02600  
 Emission Unit: S-FSBLG Emission Point: 02601  
 Emission Unit: S-FSBLG Emission Point: 02617  
 Emission Unit: H-IPSBG Emission Point: 03012 Process: HPV Emission Source: 03012  
 Emission Unit: S-FSBLG Emission Point: 02593 Process: FPV Emission Source: RECUP  
 Emission Unit: H-IPSBG Process: HSH  
 Emission Unit: A-PAREA Process: HOF  
 Emission Unit: R-ESBLG Process: RSH

This monitors on a monthly basis the opacity of the above mention emission points to ensure compliance with the 20% or less opacity standard.

6 NYCRR 212.4(c)

Emission Unit: S-FSBLG Emission Point: 01583 Process: FSH Emission Source: 01583  
 Emission Unit: S-FSBLG Emission Point: 01584 Process: FSH Emission Source: 01584  
 Emission Unit: S-FSBLG Emission Point: 01592 Process: FSH Emission Source: 01592

This monitors the opacity of the above mentioned emission points on a quarterly basis to ensure compliance with the 20% or less opacity standard.

6 NYCRR 225-1.2(a)(2)

The sulfur content is limited to less than or equal to 1.5% by weight to ensure that the sulfur dioxide emitted from the facility is limited. The facility shall monitor the sulfur in fuel certificate to ensure the sulfur in the fule is equal or less than 1.5% by weight.

6 NYCRR 225-1.8

The facility shall monitor and maintain records for a minimum of three years to ensure that the sulfur content is below specified levels.

40 CFR 60.116b(b), NSPS Subpart Kb

Emission Unit: H-IPSBG Emission Point: 03032 Process: HT2 Emission Source: 03032  
 Emission Unit: H-IPSBG Emission Point: 03033 Process: HT2 Emission Source: 03033  
 Emission Unit: R-ESBLG Emission Point: 01305 Process: RT1 Emission Source: RM607  
 Emission Unit: R-ESBLG Emission Point: 01305 Process: RT2 Emission Source: RM606  
 Emission Unit: R-ESBLG Emission Point: 01305 Process: RT3 Emission Source: RM605  
 Emission Unit: S-FSBLG Emission Point: 02710 Process: FT1 Emission Source: 02710  
 Emission Unit: S-FSBLG Emission Point: 02756 Process: FT1 Emission Source: 02756  
 Emission Unit: W-TAREA Emission Point: 00723 Process:WT2 Emission Source: 00723

The facility shall keep records readily available showing the dimensions and the capacity of the storage vessels of the above emission sources.

40 CFR 61.356(b)(1), NESHAP Subpart FF

The facility will maintain benzene wastestream records in accordance with this subpart.

40 CFR 63.165, Subpart H



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR  
Emission Unit: R-ESBLG

This monitoring condition monitors the pressure relief devices at the facility to ensure that there are not any leaks present at these devices at or above 500 ppm above background. If the indicator shows a leak then they have up to 15 days to repair the leak unless otherwise specified by the regulation.

40 CFR 63.168, Subpart H

Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR  
Emission Unit: R-ESBLG

This monitoring condition monitors valves for leaks in the systems referenced above, if the indicator shows that the facility has a leak which is defined as 500 ppm above background they have 15 days to repair the leak unless otherwise specified by the regulation.

40 CFR 63.169, Subpart H

Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR  
Emission Unit: R-ESBLG

This condition monitors for leaks in pumps, valves, connectors, and agitators in heavy liquid service, pressure relief devices in light or heavy liquid service. If a leak is found according to the methods specified in the regulation then the facility must make a first attempt of repair after 5 days. The leak shall be repaired within 15 days unless otherwise specified in the regulation.

40 CFR 63.173, Subpart H

Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR  
Emission Unit: R-ESBLG

This requirement specifies that the facility will monitor leaks for agitators. If a leak is detected they have to attempt to repair with 5 days. the leak shall be repaired within 15 days unless otherwise specified by the regulations.

40 CFR 63.163(b)(2), Subpart H

Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR

This requirement specifies for pumps in light liquid service that if a leak is detected then they have up to 5 days to make an attempt to fix the leak. The leak shall be repaired within 15 days unless otherwise specified by the regulations.

40 CFR 63.174(a), Subpart H

Emission Unit: A-PAREA Process: AFE Emission Source: ALDAR

This requirement specifies for connectors in gas/vapor and light liquid service the facility will monitor for leaks and when a leak is detected the first attempt at repair shall be done within 5 days. The leak shall be repaired within 15 days unless otherwise specified by the regulations. This condition also specifies the



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

monitoring frequency by which the facility shall check for leaks.

40 CFR 63.104, Subpart F

Emission Unit: A-PAREA Process: AFE Emission Source: APHES

This requirement monitors if there is a leak in the cooling water quarterly. If there is a leak detected the leak shall be repaired as soon as practical, but no later than 45 days. Once repair the system will be checked within 7 days.

6 NYCRR 212.4(a)

Emission Unit: A-PAREA Process: AT3

The process above uses a scrubber to ensure that the proper control is achieved for methyl alcohol, the monitoring required is that the temperature of the gas exit is to be no greater than 103 degrees Fahrenheit as a daily average.

6 NYCRR 212.10(c)

Emission Unit: A-PAREA Process: AT3

The process above uses a scrubber to ensure that the proper control is achieved for Volatile organic compounds, the monitoring required is that the temperature of the gas exit is to be no greater than 103 degrees Fahrenheit as a daily average.

40 CFR 63.119(e)(1), Subpart G

Emission Unit: A-PAREA Emission Point: 00282

This emission point shall be controlled to 95% of Hazardous Air Pollutants by maintaining the gas exit temperature at 103 degrees Fahrenheit on a daily average.

6 NYCRR 212.10(c)

Emission Unit: A-PAREA Emission Point: 01252 Process: AT5 Emission Source: M305B

Emission Unit: C-XPRSS Emission Point: 05000 Process: CXP Emission Source: 05000

Emission Unit: H-IPSBG Process: HT3

This requirement states that the Volatile Organic Compounds shall be controlled to 81%. The carbon beds for the above sources shall be checked to ensure that the reading obtained by the FID is lower than 10ppm, there will be a changeout of carbon if there is breakthrough.

6 NYCRR 212.4(a)

Emission Unit: R-ESBLG Process: RRX

This requirement states that the upper limit in pounds/ hour must be 33or less for the 5 emission points included in this process. This process is toluene controlled to 94% which also is inclusive of the 81% control of Volatile Organic Compounds.



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

6 NYCRR 212.10(c)

Emission Unit: R-ESBLG Process: RWS

This condition requires that the volatile organic compounds must be controlled to 81% or more with both condensers and scrubbers.

6 NYCRR 212.10(c)(1)

Emission Unit: R-ESBLG Emission Point: 00306 Process: RT2 Emission Source: 00306

To control volatile organic compounds to 81%, from the tanks when filling the glycol temperature must be maintained and monitored to stay at or below 30 degrees Fahrenheit in the condenser.

40 CFR 63.2470(a), Subpart FFFF

Emission Unit: R-ESBLG Emission Point: 00460 Process: RT5

To reduce hazardous air pollutants to 95% control or more the water scrubber water flow rate must be monitored on a daily average to ensure compliance with the control limit.

To reduce hazardous air pollutants to 95% control or more the methanol scrubber outlet gas temperature shall be monitored on a daily average to ensure compliance with the control limit.

To reduce hazardous air pollutants to 95% control or more the methanol scrubber methanol feed rate shall be monitored on a daily average to ensure compliance with the control limit.

To reduce hazardous air pollutants to 95% control or more the gas flow rate through the scrubber system shall be monitored on a daily average to ensure compliance with the control limit.

6 NYCRR 212.4(a)

Emission Unit: R-ESBLG Emission Point: 00460 Process: RT5

To reduce the emissions of both methanol and toluene to 94% control and volatile organic compounds to 81% control they will monitor the following; vent flow rate, liquid methanol feed rate, and methanol exit temperature on a daily average to ensure compliance with the regulations.

6 NYCRR 212.4(a)

Emission Unit: R-ESBLG Emission Point: 01355 Process: RWS Emission Source: 01355

Emission Unit: R-ESBLG Emission Point: 01356 Process: RWS Emission Source: 01356

Emission Unit: R-ESBLG Emission Point: 01357 Process: RWS Emission Source: 01357

Emission Unit: R-ESBLG Emission Point: 01358 Process: RWS Emission Source: 01358

Emission Unit: R-ESBLG Emission Point: 01359 Process: RWS Emission Source: 01359

To reduce emissions of toluene to 94% at the above mentioned sources the emission data shall be recorded continuously to ensure that the scrubbers and condensers are working properly.

40 CFR 63.2455(c), Subpart FFFF

Emission Unit: R-ESBLG Emission Point: 01365 Process: RWS



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**

The water scrubber water temperature, water scrubber water flow rate, methanol scrubber liquid methanol flow rate, gas flow rate, and the methanol scrubber liquid methanol influent temperature will be monitored on a daily average to ensure that the proper control is being attained. In this case, the TRE (Total Resource Effectiveness) must be maintained with the above mentioned parameters.

6 NYCRR 212.4(a)

Emission Unit: R-ESBLG Emission Point: 01365 Process: RWS Emission Source: IVSMS

The methyl alcohol and toluene is controlled to 99% by monitoring the emissions from the emission point.

6 NYCRR 212.4(a)

Emission Unit: R-ESBLG Emission Point: 01366 Process: RPV Emission Source: 01366

The toluene is controlled to 99% and the parameters are monitored to calculate the Emission Rate Potential emitting from the above mentioned emission point.

6 NYCRR 212.4(a)

Emission Unit: R-ESBLG Emission Point: 01379 Process: RT4 Emission Source: T1379

The carbon bed is monitored for breakthrough so that volatile organic compounds are controlled to 90% this control requirement also satisfies the 81% reasonable available control technology requirement.

6 NYCRR 212.4(a)

Emission Unit: S-FSBLG Process: FEX Emission Source: C2581

The tonnage of product is monitored to ensure that volatile organic compounds emitted are at 94% control. When the tonnage of product is reached the carbon beds are changed to ensure compliance with the regulations.

6 NYCRR 212.4(a)

Emission Unit: S-FSBLG Process: FEX Emission Source: C2593

The temperature of the recuperative thermal oxidizer shall be monitored to ensure that the volatile organic compounds emitted is controlled to the appropriate level.

6 NYCRR 212.10(c)

Emission Unit: W-TAREA Emission Point: 00712 Process: WPV Emission Source: DH712

The emission point above shall be monitored for breakthrough of the carbon bed, the volatile organic compounds shall be controlled to 90%.



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-0122-00007/00719**

**Renewal Number: 1**

**Modification Number: 2 02/10/2015**