

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0124-00001/00112 Modification Number: 5



04/24/2006

Facility Identification Data

Name: LAFARGE BUILDING MATERIALS INC
Address: US RTE 9W
RAVENA, NY 12143-0003

Owner/Firm

Name: LAFARGE NORTH AMERICA INC
Address: 12950 WORLDGATE DRIVE SUITE 500
HERNDON, VA 20170, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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Permit Description

Introduction

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

Summary Description of Proposed Project

LAFARGE IS PROPOSING A MINOR MODIFICATION TO THE FACILITY'S TITLE V PERMIT

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TO ALLOW FOR THE SPECIFIC LISTING OF TIRE DERIVED FUEL (TDF) AS AN APPROVED FUEL FOR THE FACILITY'S TWO KILNS. TO ALLOW FOR THE FIRING OF THESE FUELS, LAFARGE PROPOSES TO INSTALL A MID-KILN INJECTION SYSTEM AND ASSOCIATED CONVEYING EQUIPMENT FOR THE TDF. LAFARGE WILL ALSO INSTALL A MIXING AIR FAN TO AID IN TDF COMBUSTION.

Attainment Status

LAFARGE BUILDING MATERIALS INC is located in the town of COEYMANS 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

THIS FACILITY MANUFACTURERS PORTLAND CEMENT USING TWO WET PROCESS KILNS EQUIPPED WITH ESPS FOR PARTICULATE EMISSIONS CONTROL. CEMENT IS SOLD IN BULK AND PACKAGED FORMS AND SHIPPED FROM THE FACILITY BY TRUCK, RAIL OR BARGE.

Permit Structure and Description of Operations

The Title V permit for LAFARGE BUILDING MATERIALS INC 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



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control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

LAFARGE BUILDING MATERIALS INC is defined by the following emission unit(s):

Emission unit 041000 - EMISSION UNIT 041000 CONSISTS OF THE TWO ROTARY, WET PROCESS KILNS (KILN 1 AND KILN 2) AND THE TWO CLINKER COOLERS (CLINKER COOLER 1 AND CLINKER COOLER 2). THERE ARE BUILDINGS AT EITHER END OF THE KILNS; THE DISCHARGE END BUILDING WHERE THE CLINKER COOLERS ARE LOCATED, AND THE FEED END BUILDING.

Emission unit 041000 is associated with the following emission points (EP):
43101, 45101, 45201

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

Process: CC1CLINKER FROM KILN 1 IS AIR-COOLED IN CLINKER COOLER 1. PARTICULATE EMISSIONS ARE CONTROLLED BY A FABRIC FILTER DUST COLLECTOR. THE CLINKER COOLER IS LOCATED IN THE KILN DISCHARGE END BUILDING.

Process: CC2 is located at Building DISCHENDBG - CLINKER FROM KILN 2 IS AIR-COOLED IN CLINKER COOLER 2. PARTICULATE EMISSIONS ARE CONTROLLED BY A FABRIC FILTER DUST COLLECTOR. THE CLINKER COOLER IS LOCATED IN THE KILN DISCHARGE END BUILDING.

Process: K12MANUFACTURE OF CLINKER BY TWO ROTARY WET PROCESS KILNS. IN THE WET PROCESS, THE KILNS ARE PRIMARILY FED A WATER-BASED SLURRY. THE WATER IS DRIVEN OFF IN THE KILN AND THE RAW FEED IS CONVERTED TO CLINKER. PARTICULATE EMISSIONS ARE CONTROLLED BY TWO ELECTROSTATIC PRECIPITATOR UNITS, EACH CONSISTING OF TWO UNITS (LOWER AND UPPER). BOTH ESPTS ARE CONNECTED TO A SINGLE, MAIN STACK (EP 43101).

DURING NORMAL PRODUCTION OPERATION, THE KILNS USE A SOLID FUEL MIXTURE OF COAL AND/OR COKE OR LIQUID FUELS SUCH AS FUEL OIL. WHEN THE KILNS ARE STARTED UP, FUEL OIL IS USED TO PREHEAT THEM BEFORE RESUMING NORMAL

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PRODUCTION OPERATIONS.

AS A SOLID FUEL, THE KILNS MAY ALSO UTILIZE TIRE-DERIVED-FUEL (TDF) WHICH MAY BE FIRED IN THE KILN THROUGH A MID-KILN INJECTION SYSTEM AND ASSOCIATED CONVEYING AND HANDLING EQUIPMENT. THE PLANT ANTICIPATES USING TDF TO REPLACE UP TO 20% OF THE FOSSIL OR SOLID FUEL HEAT INPUT (6 TIRES PER REVOLUTION) FOR EACH OF THE TWO CEMENT KILNS. TDF WILL NOT BE USED DURING KILN START UP, SHUT DOWN OR MALFUNCTION. A MIXING FAN WILL BE INSTALLED IN THE KILNS TO AID TDF COMBUSTION.

Emission unit 042000 - EMISSION UNIT 042000 CONSISTS OF CLINKER TRANSFER SYSTEMS FROM THE CLINKER COOLERS TO STORAGE SILOS #8 AND #11 LOCATED IN THE MILL BUILDING AND KILN DUST FROM THE KILNS TO THE DUST LANDFILL AND DUST SCOOP SYSTEMS. THE CLINKER TRANSPORT SYSTEMS CONSISTS OF BUCKET ELEVATORS AND DRAG CONVEYORS LOCATED IN THE DISCHARGE END BUILDING AND CLINKER WELLS IN THE STORAGE HALL. THE DUST SCOOP STORAGE BIN IS LOCATED IN THE FEED END BLDG. AND THE DUST SCOOP SYSTEM IS LOCATED IN THE DUST SCOOP TOWER ADJACENT TO KILN 1.

Emission unit 042000 is associated with the following emission points (EP):

40100, 43102, 43103, 43104, 43105, 46008, 46011, 46018, 46019

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

Process: CX1 is located at Building MILLBLDING - TRANSFER OF CLINKER FROM THE CLINKER TRANSPORT SYSTEMS FOR EACH KILN SYSTEM TO CLINKER SILO 8 AND CLINKER SILO 11 LOCATED IN THE MILL BUILDING.

Process: CX2 is located at Building DISCHENDBG - TRANSFER OF CLINKER COOLER 1 VIA CLINKER TRANSPORT SYSTEM 1 AND FROM CLINKER COOLER 2 VIA CLINKER TRANSPORT SYSTEM 2 TO THE FEED BELTS FOR CLINKER SILOS 8 AND 11. CLINKER TRANSPORT SYSTEM 1 IS COMPRISED OF THE EAST BUCKET ELEVATOR (#461206), THE WEST BUCKET ELEVATOR (#461207), THE EAST DRAG CONVEYOR (#461208), THE WEST DRAG CONVEYOR (#461209) AND THE KILN 1 CLINKER WELL IN THE CLINKER STORAGE HALL. CLINKER TRANSPORT SYSTEM 2 IS COMPRISED OF THE EAST BUCKET ELEVATOR (#462206), THE WEST BUCKET ELEVATOR (#462207), THE EAST DRAG CONVEYOR (#462208), THE WEST DRAG CONVEYOR (#462209), THE COLLECTOR DRAG CONVEYOR (#460204) AND THE KILN 2 CLINKER WELL IN THE CLINKER STORAGE HALL. BOTH TRANSPORT SYSTEMS ARE LOCATED IN THE DISCHARGE END BUILDING. THIS PROCESS INCLUDES ALLEVIATORS ON THE KILN 1 AND KILN 2 DISCHARGE END DUST SILOS.

Process: CX3 TRANSFER OF CLINKER TO THE DUST SCOOP SYSTEM #1. CLINKER WILL BE INJECTED INTO THE KILN VIA THE EXISTING DUST SCOOP SYSTEM. TRANSFER POINTS WILL BE VENTED TO A FABRIC FILTER DUST COLLECTOR.

Process: DS1 is located at Building SCOOPTOWR1 - TRANSFER OF CEMENT KILN DUST (CKD) TO THE DUST SCOOP STORAGE BIN #1 IN THE FEED END BUILDING AND THEN TO DUST SCOOP TOWER AND TRANSFER SYSTEM #1 WHERE IT IS REINTRODUCED INTO KILN 1.

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THE DUST SCOOP TOWER IS LOCATED ADJACENT TO KILN 1 AS THE SCOOP SYSTEM IS A DEVICE WHICH INTRODUCES CKD BACK INTO THE HOT SECTION OF THE KILN, BENEATH THE FORMING CLINKER. CLINKER WILL ALSO BE REINTRODUCED TO THE KILN AT THIS POINT.

Process: DS2 is located at Building SCOOPTOWR2 - TRANSFER OF CEMENT KILN DUST (CKD) TO DUST SCOOP STORAGE BIN #2 IN THE FEED END BUILDING AND THEN TO DUST SCOOP TOWER AND TRANSFER SYSTEM #2 WHERE IT IS TO BE REINTRODUCED INTO KILN 2. THE DUST SCOOP SYSTEM #2 IS TO BE INSTALLED AND WILL BE IDENTICAL IN DESIGN TO DUST SCOOP SYSTEM #1. THIS PROCESS IS CONSIDERED TO BE AN ALTERNATE OPERATING SCENARIO FOR TITLE V PURPOSES AND FURTHER DETAIL IS PROVIDED IN APPENDIX F.

Process: PEL is located at Building PUGBLDG - TRANSFER OF CKD TO THE PELLETIZER SYSTEM. DUST WILL BE PENUMATICALLY CONVEYED (VIA EXISTING EQUIPMENT) FROM THE DUST WASTE SILO IN THE KILN FEED END BUILDING TO AN INTERMEDIATE DUST STORAGE SILO FOR THE PELLETIZER SYSTEM. DUST WILL BE TRANSFERRED FROM THE SILO TO THE PELLETIZER UNIT VIA SCREW CONVEYOR. ALL TRANSFER POINTS ARE TO BE CONTROLLED BY A FABRIC FILTER (4DC11). THIS SYSTEM IS TO BE INSTALLED IN APRIL 1998. THIS PROCESS IS CONSIDERED TO BE AN ALTERNATE OPERATING SCENARIO FOR TITLE V PURPOSES AND FURTHER DETAIL IS PROVIDED IN APPENDIX F.

Process: PUG is located at Building PUGBLDG - TRANSFER OF CKD TO THE PUG MILL SYSTEM. DUST WILL BE PENUMATICALLY CONVEYED FROM THE DUST WASTE SILO IN THE KILN FEED END BUILDING TO AN INTERMEDIATE DUST STORAGE SILO FOR THE PUG MILL SYSTEM. DUST WILL BE TRANSFERRED FROM THE SILO TO THE PUG MILL VIA AN AIR SLIDE. ALL TRANSFER POINTS ARE CONTROLLED BY A FABRIC FILTER (4DC11). THE PUGMILL'S FUNCTION IS TO PRE-CONDITION THE DUST PRIOR TO REMOVAL.

Emission unit 100000 - EMISSIONS UNIT 100000 CONTAINS EMISSION SOURCES INVOLVED IN THE FACILITY'S WHARF OPERATIONS. THIS INCLUDES THE TRANSFER OF FINISHED PRODUCT FROM BELT 9 TO BARGES. PARTICULATE EMISSIONS FROM THIS TRANSFER IS CONTROLLED BY A BAGHOUSE.

Emission unit 100000 is associated with the following emission points (EP):
58001

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

Process: CMB is located at GROUND, Building WHARF AREA - TRANSFER OF FINISHED CEMENT FROM BELT 9 TO BARGES LOCATED IN THE WHARF AREA.

Emission unit 090000 - EMISSION UNIT 090000 CONTAINS EMISSION SOURCES INVOLVED IN THE FACILITY'S QUARRY OPERATIONS. THIS INCLUDES THE PRIMARY CRUSHER LOCATED IN THE PRIMARY CRUSHER BUILDING.

Emission unit 090000 is associated with the following emission points (EP):
32002

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

Process: PCR is located at GROUND, Building PRCRUSHER - PRIMARY CRUSHING OF CALCIUM SOURCES (E.G., LIMESTONE) USED IN CEMENT MANUFACTURE.

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Emission unit 072000 - EMISSION UNIT 072000 CONSISTS OF COVERED BELT CONVEYORS USED TO TRANSPORT FINISHED CEMENT BETWEEN THE CUSTOMER AND BUFFER SILOS AND FROM THE SILOS TO THE WHARF AREA FOR BARGE SHIPMENT. THE BELT THAT TRANSFERS PRODUCT BETWEEN THE CUSTOMER AND BUFFER SILOS IS LOCATED AT THE NORTH END OF THE BUFFER SILOS. THE THREE BELTS WHICH TRANSPORT PRODUCT TO THE WHARF ARE BELTS 8A, 8B, AND 9. PARTICULATE EMISSIONS FROM ALL TRANSFER POINTS ARE CONTROLLED BY BAGHOUSES.

Emission unit 072000 is associated with the following emission points (EP):
57001, 57002, 57003, 62001

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

Process: CMX is located at Building BUFFESILOS - TRANSFER OF FINISHED CEMENT BETWEEN THE BUFFER AND CUSTOMER SILOS AND FROM THE SILOS TO THE WHARF AREA FOR BARGE SHIPMENT. THE TRANSFER BETWEEN THE BUFFER AND CUSTOMER SILOS (EMISSION SOURCE 72XFR) CONSISTS OF AN AIRSLIDE, THE NORTHWEST REVERSIBLE CONVEY OR AND TRANSFER INTO A HOPPER OVER A CEMENT PUMP (#620501). PARTICULATE EMISSIONS FROM ALL TRANSFER POINTS ARE CONTROLLED BY BAGHOUSES. THE TRANSFER BETWEEN THE BUFFER AND CUSTOMER SILOS IS LOCATED AT THE NORTH END OF THE BUFFER SILOS, AND THE LOAD POINT FOR BELT 8A IS AT THE SOUTH END OF THE BUFFER SILOS. THE TRANSFER POINTS BETWEEN BELTS 8A AND 8B AND BETWEEN BELTS 8B AND 9 OCCUR AT TRANSFER HOUSES BETWEEN THE BELTS GOING DOWN TO THE WHARF AREA.

Emission unit 053000 - EMISSION UNIT 053000 CONSISTS OF THE CEMENT MILL 3 SYSTEM. THIS INCLUDES FEED BELTS TO THE CEMENT MILL, THE MILL, CONVEYING EQUIPMENT AFTER THE MILL (BUCKET ELEVATOR AND AIR SLIDES), THE MILL 3 SEPARATOR AND CEMENT COOLER. ALL OF THE COMPONENTS OF THE CEMENT MILL 3 SYSTEM ARE CONTAINED IN THE MILL BUILDING.

Emission unit 053000 is associated with the following emission points (EP):
52301, 53301, 53302

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

Process: CM3 is located at GROUNDN, Building MILLBLDING - GRINDING OF CLINKER TO PRODUCE FINISHED PORTLAND CEMENT. THIS PROCESS IS LOCATED IN THE MILL BUILDING.

Process: FX3 is located at ALL, Building MILLBLDING - TRANSFER OF CLINKER TO CEMENT MILL 3 AND THE TRANSFER OF FINISHED CEMENT THROUGH THE CEMENT MILL 3 SYSTEM'S SEPARATOR, BUCKET ELEVATOR, AIRSLIDES, CEMENT COOLER, AND THE HOPPER ABOVE THE FK PUMP WHICH TRANSPORTS IT TO THE CUSTOMER AND BUFFER STORAGE SILOS. THE ENTIRE CEMENT MILL 3 SYSTEM IS CONTAINED IN THE MILL BUILDING

Emission unit 071000 - EMISSION UNIT 071000 CONTAINS THE CEMENT LOADOUT AND PRODUCT SHIPMENT ACTIVITIES AT THE FACILITY. SPECIFICALLY, THIS INCLUDES THE NORTH AND SOUTH TRUCK LOADING SPOUTS AND THE RAILCAR LOADING SPOUTS LOCATED AT THE CUSTOMER SILOS, AND THE EAST AND WEST BAGGING MACHINES LOCATED IN THE PACKHOUSE AS WELL AS THE REVERSIBLE CONVEYORS WHICH

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TRANSFER PRODUCT TO THESE AREAS. MISCELLANEOUS EMISSION SOURCES ASSOCIATED WITH THE PACKHOUSE (BAG SHREDDER AND VACUUM) ARE ALSO INCLUDED IN EU 071000.

Emission unit 071000 is associated with the following emission points (EP): 62007, 62008, 62009, 63001, 63002, 63003, 63004

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

Process: BAG is located at Building PACKHSEBLG - FILLING OF BAGS OF CEMENT VIA TWO BAGGING MACHINES DESIGNATED AS EAST AND WEST. THE WEST BAGGING MACHINE SYSTEM (EMISSION SOURCE 71WBM) CONSISTS OF A BUCKET ELEVATOR (#630202); A ROTEX SCREEN (#630106); THE SURGE BIN OVER THE BAGGING MACHINE; THE BAGGING MACHINE ITSELF (#630102). THE EAST BAGGING MACHINE SYSTEM (EMISSION SOURCE 71EBM) CONSISTS OF A BUCKET ELEVATOR (#630201); A ROTEX SCREEN (#630105); THE SURGE BIN OVER THE BAGGING MACHINE; THE BAGGING MACHINE (#630101). THIS ENTIRE PROCESS IS LOCATED IN THE PACKHOUSE.

Process: CL1 is located at Building CUSTOSILOS - LOADOUT OF FINISHED CEMENT FROM CUSTOMER SILOS TO TRUCKS VIA THE NORTH LOADING SPOUT. THIS INCLUDES TRANSPORT OF FINISHED PRODUCT TO THE LOADING SPOUT VIA THE NORTH REVERSIBLE CONVEYOR. THE SPOUT AND CONVEYOR ARE LOCATED IN THE CUSTOMER SILO AREA OF THE FACILITY.

Process: CL2 is located at Building CUSTOSILOS - LOADOUT OF FINISHED CEMENT FROM CUSTOMER SILOS TO TRUCKS VIA THE SOUTH LOADING SPOUT. THIS INCLUDES TRANSPORT OF FINISHED PRODUCT TO THE LOADING SPOUT VIA THE SOUTH REVERSIBLE CONVEYOR AND SCREW CONVEYOR TO THE SPOUT. THE SPOUT AND CONVEYORS ARE LOCATED IN THE CUSTOMER SILO AREA OF THE FACILITY.

Process: CL3 LOADOUT OF FINISHED CEMENT FROM CUSTOMER SILOS TO RAILCARS VIA TWO LOADING SPOUTS. THIS INCLUDES TRANSPORT OF FINISHED PRODUCT TO THE LOADOUT SPOUTS VIA THE NORTH AND SOUTH REVERSIBLE CONVEYORS. THE SPOUTS AND CONVEYORS ARE LOCATED IN THE CUSTOMER SILO AREA OF THE FACILITY.

Process: PBS is located at GROUND, Building PACKHSEBLG - SHREDDING OF REJECT BAGS FROM THE BAG MACHINE SYSTEMS. PARTICULATE EMISSIONS FROM THIS PROCESS ARE CONTROLLED BY A BAGHOUSE.

Process: PVC is located at GROUND, Building PACKHSEBLG - VACUUM FOR CLEANUP OF PACKHOUSE AREA. PARTICULATE EMISSIONS FROM THE VACUUM ARE CONTROLLED BY A SMALL BAGHOUSE.

Emission unit 052000 - EMISSION UNIT 052000 CONSISTS OF THE CEMENT MILL 2 SYSTEM. THIS INCLUDES FEED BELTS TO THE CEMENT MILL, THE MILL, CONVEYING EQUIPMENT AFTER THE MILL (BUCKET ELEVATOR AND AIR SLIDES), THE MILL 1 SEPARATOR AND CEMENT COOLER. ALL OF THE COMPONENTS OF THE CEMENT MILL 2 SYSTEM ARE CONTAINED IN THE MILL BUILDING.

Emission unit 052000 is associated with the following emission points (EP): 52201, 53201, 53202

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

Process: CM2 is located at GROUND, Building MILLBLDING - GRINDING OF CLINKER TO PRODUCE FINISHED PORTLAND CEMENT. THIS PROCESS IS LOCATED IN THE MILL

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Process: FX2 is located at ALL, Building MILLBLDING - TRANSFER OF CLINKER TO CEMENT MILL 2 AND THE TRANSFER OF FINISHED CEMENT THROUGH THE CEMENT MILL 2 SYSTEM'S SEPARATOR, BUCKET ELEVATOR, AIRSLIDES, CEMENT COOLER, AND THE HOPPER ABOVE THE FK PUMP WHICH TRANSPORTS IT TO THE CUSTOMER AND BUFFER STORAGE SILOS . THE ENTIRE CEMENT MILL 2 SYSTEM IS CONTAINED IN THE MILL BUILDING.

Emission unit 051000 - EMISSION UNIT 051000 CONSISTS OF THE CEMENT MILL 1 SYSTEM. THIS INCLUDES FEED BELTS TO THE CEMENT MILL, THE MILL, CONVEYING EQUIPMENT AFTER THE MILL (BUCKET ELEVATOR AND AIR SLIDES), THE MILL 1 SEPARATOR AND CEMENT COOLER. ALL OF THE COMPONENTS OF THE CEMENT MILL 1 SYSTEM ARE CONTAINED IN THE MILL BUILDING.

Emission unit 051000 is associated with the following emission points (EP):
52101, 53101, 53102

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

Process: CM1 is located at GROUND, Building MILLBLDING - GRINDING OF CLINKER TO PRODUCE FINISHED PORTLAND CEMENT. THIS PROCESS IS LOCATED IN THE MILL BUILDING.

Process: FX1 is located at ALL, Building MILLBLDING - TRANSFER OF CLINKER TO CEMENT MILL 1 AND THE TRANSFER OF FINISHED CEMENT THROUGH THE CEMENT MILL 1 SYSTEM'S SEPARATOR, BUCKET ELEVATOR, AIRSLIDES, CEMENT COOLER, AND THE HOPPER ABOVE THE FK PUMP WHICH TRANSPORTS IT TO THE CUSTOMER AND BUFFER STORAGE SILOS . THE ENTIRE CEMENT MILL 1 SYSTEM IS CONTAINED IN THE MILL BUILDING.

Emission unit 073000 - EMISSION UNIT 073000 CONSISTS OF THE K-CEMENT IMPORT AND STORAGE SYSTEM. K-CEMENT IS IMPORTED BY RAILCAR AND STORED IN TWO BERTHA TANKS LOCATED OUTSIDE BY THE CUSTOMER SILOS. PARTICULATE EMISSIONS FROM THE TRANSFER OF K-CEMENT INTO THE TANKS ARE CONTROLLED BY A BAGHOUSE.

Emission unit 073000 is associated with the following emission points (EP):
62010

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

Process: KCMTRANSFER OF K-CEMENT SHIPPED IN BY RAILCARS AND STORED IN TWO DEDICATED BERTHA TANKS.

Emission unit 054000 - EMISSION UNIT 054000 CONSISTS OF THE CEMENT MILL 4 SYSTEM. THIS INCLUDES FEED BELTS TO THE CEMENT MILL, THE MILL, CONVEYING EQUIPMENT AFTER THE MILL (BUCKET ELEVATOR AND AIR SLIDES), THE TWO MILL 4 SEPARATORS AND CEMENT COOLER. ALL OF THE COMPONENTS OF THE CEMENT MILL 4 SYSTEM ARE CONTAINED IN THE MILL BUILDING.

Emission unit 054000 is associated with the following emission points (EP):
52401, 53401, 53402, 53403

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

Process: CM4 is located at GROUND, Building MILLBLDING - GRINDING OF CLINKER TO

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PRODUCE FINISHED PORTLAND CEMENT. THIS PROCESS IS LOCATED IN THE MILL BUILDING.

Process: FX4 is located at ALL, Building MILLBLDING - TRANSFER OF CLINKER TO CEMENT MILL 4 AND THE TRANSFER OF FINISHED CEMENT THROUGH THE CEMENT MILL 4 SYSTEM'S BUCKET ELEVATOR, AIRSLIDES, CEMENT COOLER, AND THE HOPPER ABOVE THE FK PUMP WHICH TRANSPORTS IT TO THE CUSTOMER AND BUFFER STORAGE SILOS. THE ENTIRE CEMENT MILL 4 SYSTEM IS CONTAINED IN THE MILL BUILDING.

Process: FX5 is located at 6, Building MILLBLDING - SEPARATION BY PARTICLE SIZE OF FINISHED CEMENT FROM CEMENT MILL 4 BY TWO SEPARATORS - CM4 SEPARATOR 1 (SOUTH) AND CM4 SEPARATOR 2 (NORTH). THIS PROCESS ALSO INCLUDES THE AIRSLIDES WHICH CONVEY THE CEMENT TO THE SEPARATORS AS THEY ARE CONTROLLED BY THE SAME DUST COLLECTORS THAT CONTROL PARTICULATE EMISSIONS FOR THE SEPARATORS. THIS PROCESS IS LOCATED IN THE MILL BUILDING.

Emission unit 020000 - EMISSION UNIT 020000 CONTAINS EMISSION SOURCES INVOLVED IN THE HANDLING OF RAW MATERIALS AND SOLID FUELS AT THE FACILITY. THIS INCLUDES THE SECONDARY CRUSHER LOCATED IN THE SECONDARY CRUSHER BUILDING, CONVEYOR #7, WHICH DISCHARGES IN THE MILL BUILDING, EMISSION 031000 CONSISTS OF THE RAW MILL 1 SYSTEM WHICH INCLUDES A BUCKET ELEVATOR, A MILL FEED BELT, A WOBBLER FEEDER AND TERTIARY CRUSHER. THE ENTIRE SYSTEM IS LOCATED IN THE MILL BUILDING. AND THE FLY ASH SYSTEM LOCATED IN THE MILL BUILDING AND FLY ASH SILO.

Emission unit 020000 is associated with the following emission points (EP):
34301, 46012, 46013, 46017

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

Process: FAX is located at ROOF, Building FLYASHSILO - TRANSFER OF FLY ASH TO FLY ASH STORAGE SILO FROM TRUCKS AND FROM SILO TO FLY ASH ALLEVIATOR.

Process: LCR is located at GROUND, Building 2NDCRUSHER - SECONDARY CRUSHING OF CALCIUM SOURCES (E.G., LIMESTONE) USED IN CEMENT MANUFACTURE.

Process: RX1 is located at GROUND, Building 2NDCRUSHER - TRANSFER OF RAW MATERIALS THROUGH THE SECONDARY CRUSHER AND ONTO CONVEYOR #7. CALCIUM SOURCES (LIMESTONE), SOLID FUELS, AND IRON SOURCES ARE TRANSFERRED THROUGH THE SECONDARY CRUSHER AND ONLY CONVEYOR #7.

Process: RX2 is located at 6, Building MILLBLDING - TRANSFER OF RAW MATERIALS (CALCIUM SOURCES, SOLID FUEL, AND IRON SOURCES) FROM CONVEYOR 7 DISCHARGE CHUTE TO THE SHUTTLE BELT LOAD CHUTE.

Emission unit 031000 - EMISSION 031000 CONSISTS OF THE RAW MILL 1 SYSTEM WHICH INCLUDES A BUCKET ELEVATOR, A MILL FEED BELT, A WOBBLER FEEDER AND TERTIARY CRUSHER. THE ENTIRE SYSTEM IS LOCATED IN THE MILL BUILDING

Emission unit 031000 is associated with the following emission points (EP):
35101

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

Process: RM1 is located at GROUND, Building MILLBLDING - TRANSFER OF RAW MATERIAL THROUGH BUCKET ELEVATOR, FEED BELT AND WOBBLER FEEDER/TERTIARY CRUSHER TO RAW MILL 1.



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Process: TC1 is located at GROUND, Building MILLBLDING - TERTIARY CRUSHING OF RAW MATERIAL PRIOR TO RAW MILL 1.

Emission unit 032000 - EMISSION 032000 CONSISTS OF THE RAW MILL 2 SYSTEM WHICH INCLUDES A BUCKET ELEVATOR, A FEED BELT TO THE MILL, A WOBBLER FEEDER AND TERTIARY CRUSHER. THE ENTIRE SYSTEM IS LOCATED IN THE MILL BUILDING.

Emission unit 032000 is associated with the following emission points (EP):
35201

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

Process: RM2 is located at GROUND, Building MILLBLDING - TRANSFER OF RAW MATERIAL THROUGH BUCKET ELEVATOR, FEED BELT AND WOBBLER FEEDER/TERTIARY CRUSHER TO RAW MILL 2.

Process: TC2 is located at GROUND, Building MILLBLDING - TERTIARY CRUSHING OF RAW MATERIAL PRIOR TO RAW MILL 2.

Title V/Major Source Status

LAFARGE BUILDING MATERIALS INC is subject to Title V requirements. This determination is based on the following information:

The facility has the potential for emissions of both criteria pollutants (carbon monoxide, NOx, sulfur dioxide, VOC) and individual HAP (hazardous air pollutants) (dioxin/furans, acrolein, benzene, hydrogen chloride, hydrogen fluoride) to be greater than the major source thresholds.

Program Applicability

The following chart summarizes the applicability of LAFARGE BUILDING MATERIALS INC with regards to the principal air pollution regulatory programs:

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

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RACT	YES
SIP	YES

NOTES:

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

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

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

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

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

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

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

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

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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
3241	CEMENT, HYDRAULIC

SCC Codes

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

SCC Code	Description
3-05-007-19	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Cement Load Out
3-05-007-14	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Clinker Cooler
3-05-007-17	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Clinker Grinding
3-05-007-16	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Clinker Transfer
3-05-007-29	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) FINISH GRINDING MILL AIR SEPARATOR



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- 3-05-007-06 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Kilns
3-05-007-99 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Other Not Classified
3-05-007-09 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Primary Crushing
3-05-007-12 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Raw Material Transfer
3-05-007-10 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Secondary Crushing

Facility Emissions Summary

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

Table with 3 columns: Cas No., Contaminant Name, and PTE. Includes entries for 2,3,7,8-TETRACHLORODIBENZO-P-D IOXIN (HAP), ACETALDEHYDE (HAP), ACROLEIN (HAP), AMMONIA, ANTIMONY (HAP), ARSENIC (HAP), BARIUM, BENZENE (HAP), BERYLLIUM (HAP), and CADMIUM (HAP).

Range

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000630-08-0	CARBON MONOXIDE	2892509	
007440-47-3	CHROMIUM (HAP)		> 0 but < 10 tpy
018540-29-9	CHROMIUM (VI) (HAP)		> 0 but < 10 tpy
007440-48-4	COBALT (HAP)		> 0 but < 10 tpy
007440-50-8	COPPER		> 0 but < 2.5 tpy
000050-00-0	FORMALDEHYDE (HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 10 tpy but < 25 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)		>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE (HAP)		>= 10 tpy
007439-92-1	LEAD (HAP)		> 0 but < 10 tpy
007439-96-5	MANGANESE (HAP)		> 0 but < 10 tpy
007439-97-6	MERCURY (HAP)		> 0 but < 10 tpy
000074-82-8	METHANE		>= 10 tpy but < 25 tpy
0NY059-28-0	NICKEL (NI 059) (HAP)		> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 250 tpy
0NY075-00-5	PM-10		>= 250 tpy
001336-36-3	POLYCHLORINATED BIPHENYL (HAP)		> 0 but < 10 tpy
007782-49-2	SELENIUM (HAP)		> 0 but < 10 tpy
007440-22-4	SILVER		> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE		>= 250 tpy
007440-28-0	THALLIUM		> 0 but < 2.5 tpy
007440-62-2	VANADIUM		> 0 but < 2.5 tpy
000075-01-4	VINYL CHLORIDE (HAP)		> 0 but < 10 tpy
0NY998-00-0	VOC		>= 250 tpy
007440-66-6	ZINC		>= 10 tpy but < 25 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 201-1.5

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

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

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

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

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

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

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

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

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

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

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of

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a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

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

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

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

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- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in

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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.

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Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	5-33
0-41000/43101/K12	40CFR 52-A.21	Prevention of Significant Deterioration	5-25
0-41000/43101/K12	40CFR 52-A.21(r)	Source obligation	5-31, 5-32
0-41000/43101/K12	40CFR 63-LLL.1343 (b) (1)	NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills	68
0-41000/43101/K12	40CFR 63-LLL.1343 (b) (2)	Standards for Kilns	69
0-41000/43101/K12	40CFR 63-LLL.1343 (b) (3)	Existing, reconstructed or new brownfield/major sources	70
0-41000/43101/K12	40CFR 63-LLL.1344 (a)	Operating Limits for kilns	71
0-41000/43101/K12	40CFR 63-LLL.1344 (b)	Operating limits for kilns	72
0-41000	40CFR 63-LLL.1345 (a) (1)	NESHAP for Portland Cement Manufacturing - Standards for clinker coolers	3-24
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0-41000	40CFR 63-LLL.1350 (d) (1)	Monitoring Requirements	3-26
0-41000	40CFR 63-LLL.1350 (d) (3)	Monitoring Requirements	3-27
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0-41000	40CFR 63-LLL.1350 (f)	Monitoring requirements	62
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Applicability Discussion:

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

ECL 19-301.

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

6NYCRR Part 200-.6

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

6NYCRR Part 200-.7

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

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effectively

6NYCRR Part 201-1.2

Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-5

This regulation applies to those permit terms and conditions which are not federally enforceable. It specifies the applicability criteria for state facility permits, the

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information to be included in all state facility permit applications as well as the permit content, terms of permit issuance, and sets guidelines for modifying state facility permits and allowing for operational flexibility. For permitting purposes, this rule specifies the need to list all emission units except those that are exempt or trivial pursuant to Subpart 201-3 in the permit application and provide a description of the emission unit's processes and products. Finally, this rule also provides the Department the authority to include this and any other information that it deems necessary to identify applicable Federal standards, recordkeeping and reporting requirements, and establish terms and conditions that will ensure compliance with the national ambient air quality standards.

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

6NYCRR Part 201-6

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

6NYCRR 201-6.5(a)(4)

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

6NYCRR 201-6.5(a)(7)

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

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

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

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

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

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

6NYCRR 201-6.5(d)(5)

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

6NYCRR Part 201-6.5(e)

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

6NYCRR 201-6.5(f)(6)

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

6NYCRR Part 202-1.1

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

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6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-2

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

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, LAFARGE BUILDING MATERIALS INC has been determined to be subject to

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the following regulations:

40CFR 52-A.21

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

40CFR 52-A.21 (r)

Source Obligation:

40CFR 63-LLL.1343 (b) (1)

This section provides particulate matter emission limitations for certain operations (kilns and in-line kiln/raw mills) at existing, reconstructed, or new brownfield/major sources.

40CFR 63-LLL.1343 (b) (2)

Provided here is an emission limitation for visible emissions (opacity) on certain operations (kilns and in-line kiln/raw mills) at existing, reconstructed, or new brownfield/major sources.

40CFR 63-LLL.1343 (b) (3)

Contained here are Dioxin/Furan emission limits for certain operations (kilns and in-line kiln/raw mills) at existing, reconstructed, or new brownfield/major sources.

40CFR 63-LLL.1344 (a)

This provision limits the temperature of exhaust gas exiting certain locations of the cement manufacturing process and leading to particulate matter control devices (ie. baghouse, etc.).

40CFR 63-LLL.1344 (b)

This section provides a temperature limit for affected sources.

40CFR 63-LLL.1345 (a) (1)

This regulation requires the owner or operator of a new or existing clinker cooler at a facility which is a major source, subject to Subpart LLL, to limit the emissions of particulates from the clinker to 0.10 pounds per ton of feed (0.05 kg/MG) to the kiln. Emissions testing is required initially and every 5 years thereafter.

40CFR 63-LLL.1345 (a) (2)

This regulation requires the owner or operator of a new or existing clinker cooler at a facility which is a major source subject to Subpart LLL to limit the opacity of its emissions to less than 10 percent.

40CFR 63-LLL.1347

This establishes a 10% opacity limit (visible emission limit) for subject sources.

40CFR 63-LLL.1348

This section establishes a 10% opacity limit (visible emission limit) for affected sources.

40CFR 63-LLL.1349 (a)

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This section outlines various information to be documented when determining compliance with emission limits.

40CFR 63-LLL.1349 (b) (1)

Performance tests for determining if the facility is meeting particulate matter emission limits are specified in this section along with emission rate equations.

40CFR 63-LLL.1349 (b) (2)

This regulation requires the owner or operator of any source subject to opacity limitations under Subpart LLL to conduct a test in accordance with Method 9 of Appendix A or 40 CFR 60. This performance test shall be conducted when the source is operating at the highest load or capacity level reasonably expected to occur.

40CFR 63-LLL.1349 (b) (3)

Performance tests for determining if the facility is meeting dioxin/furan emission limits are specified in this section.

40CFR 63-LLL.1349 (c)

This requires the owner or operator to repeat performance tests every five years.

40CFR 63-LLL.1349 (d)

Performance tests required under paragraph (b)(3) of this section shall be repeated every 30 months.

40CFR 63-LLL.1349 (e)

This section requires the owner or operator to repeat performance tests within 90 days if a significant change in fuel or feed is used.

40CFR 63-LLL.1350 (a)

The owner or operator of a portland cement plant subject to this regulation is required to provide a written operations and maintenance plan. This plan includes procedures for proper operation, corrective action should a problem occur, inspection procedures, and periodic monitoring of sources subject to opacity standards.

40CFR 63-LLL.1350 (a) (4) (i)

This regulation requires the owner or operator to conduct a monthly 1-minute visible emissions test of each affected source subject to opacity standards under 40 CFR 63.1346 and 63.1348, in accordance with Method 22 of Appendix A of 40 CFR 60. The test must be conducted while the source is in operation.

40CFR 63-LLL.1350 (b)

63.1350(b) specifies that failure to comply with the operations and maintenance plan is a violation.

40CFR 63-LLL.1350 (c) (1)

This section requires the use of a continuous monitor for opacity and requires proper installation, maintenance, and calibration of this equipment.

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40CFR 63-LLL.1350 (c) (3)

This section specifies an averaging period for opacity readings. In this case the opacity is averaged over a 6 minute period and can not exceed 20%.

40CFR 63-LLL.1350 (d) (1)

This regulation requires the owner or operator of a clinker cooler to monitor opacity at each point where emissions are vented from the clinker cooler. The owner or operator must install, maintain, calibrate and continuously operate a Continuous Opacity Monitor (COM) located at the outlet of the clinker cooler particulate matter control device to continuously monitor the opacity.

40CFR 63-LLL.1350 (d) (3)

This regulation requires that the opacity from the clinker cooler must be controlled such that the 6-minute average opacity for any 6-minute block period does not exceed 10 percent. Any average opacity for a 6-minute block period that exceeds 10 percent will constitute a violation of the standard.

40CFR 63-LLL.1350 (e)

This condition requires the facility to conduct visual inspections to see if any emissions are coming out of the mill sweep and air separator PMCD's of the plant. If emissions are visible from these areas of the plant, then the owner/operator is required to perform corrective actions that are outlined in the operation and maintenance plan and then within 24 hours perform a Method 9 analysis to determine the opacity of the emissions coming from these areas of the plant.

40CFR 63-LLL.1350 (f)

The owner or operator of an affected source shall monitor D/F emissions by continuously monitoring and recording the exhaust gas temperature from various devices. The temperature monitor shall be calibrated and maintained to ensure accurate readings. Dioxins and furans (D/F) means tetra-, penta-, hexa-, hepta-, and octa- chlorinated dibenzo dioxins.

40CFR 63-LLL.1350 (i)

The owner or operator subject to dioxin and furan emission limits under this subpart shall inspect the components of the combustion system at least once per year.

40CFR 63-LLL.1350 (j)

This section requires the owner or operator of affected sources subject to opacity limitations to monitor opacity in accordance with the operation and maintenance plan prepared for the facility.

40CFR 63-LLL.1351 (a)

The owner or operator of an existing facility must be in compliance with this subpart by June 10, 2002.

40CFR 63-LLL.1352

Owners and operators conducting tests to determine the emission rates of hydrogen chloride and specific organic hazardous air pollutants are permitted to use other methods than those specified in table 1. These other methods are discussed in 63.1352 of this regulation with more detailed descriptions in appendix A of this part and appendix A to Part 60 of this chapter.

40CFR 63-LLL.1353

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Notification requirements including performance tests, visible emission observations, and compliance status, among other things, are specified in this section.

40CFR 63-LLL.1354

The owner or operator of affected facilities have to comply with the reporting requirements of this section.

These reporting requirements outline what information needs to be provided in the reports, and when the reports need to be submitted.

40CFR 63-LLL.1355

Recordkeeping requirements specify that the owner or operator shall maintain files of all required information on site for inspection and review purposes. Generally, the files are kept for a minimum of five years.

40CFR 63-LLL.1356

With some exceptions, any affected source subject to these provisions is exempt from 40 CFR part 60, subpart F.

6NYCRR 201-1.4 (a)

All activities involving equipment maintenance or start-up/shutdown that may result in a violation of an emission standard need to be recorded and a written report must be submitted to the department. The report should describe why the violation was unavoidable and include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. Sources which are subject to a continuous monitoring and quarterly reporting requirement are exempt from the above.

6NYCRR 201-6.3 (d) (10) (ii)

This regulation specifies that an identification of methods used for determining compliance be included with any complete Title V permit application. This would include a description of monitoring, recordkeeping, and reporting requirements and test methods.

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

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

6NYCRR 201-7.1

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

6NYCRR 202-1.2

This regulation specifies that the department is to be notified at least 30 days in advance of any required stack test. The notification is to include a list of the procedures to be used that are acceptable to the department. Finally, free access to observe the stack test is to be provided to the department's representative.

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6NYCRR 202-1.3 (a)

This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. In addition, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6NYCRR 204-1.6

This condition requires the designated representative of the permittee to make submissions for the NOx Budget Program. The Program is designed to mitigate the interstate transport of ground level ozone and nitrogen oxides, a ground level ozone precursor.

6NYCRR 204-2.1

This condition states the submission requirements for the NOx Budget Trading Program. The Program is designed to mitigate the interstate transport of ground level ozone and nitrogen oxides, a ground level ozone precursor.

6NYCRR 204-4.1

This condition covers the compliance certification report requirements for the NOx Budget Program.

6NYCRR 204-7.1

This condition lists the requirements for transfer of allowances in the NOx Budget Program.

6NYCRR 204-8.1

This condition lists the general requirements for the NOx Budget trading program. They include, but are not limited to monitoring requirements, certification, record keeping and reporting.

6NYCRR 204-8.2

This condition covers the procedures for initially certifying and recertifying the monitoring systems of the unit meet the requirements of the NOx Budget Program

6NYCRR 204-8.3

This condition states the requirements for data substitution during times when the monitoring systems do not meet applicable quality assurance requirements.

6NYCRR 204-8.4

This condition lists the addresses where monitoring plans and their modifications, compliance certifications, recertifications, quarterly QA/QC reports and petitions for alternative monitoring shall be sent.

6NYCRR 204-8.7

This condition is a requirement for monitoring and reporting if a particular monitoring scenario is utilized.

6NYCRR 212.10 (f)

Owners and/or operators must submit a RACT compliance plan with each application for a permit to

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construct and implement this plan when operation commences. A RACT analysis may not be required if emission levels fall below certain limits.

6NYCRR 212 .3

Part 212 applies to all facilities unless they are exempt per Part 212.7. Part 212.7 exempts the kilns and clinker coolers (only for emissions not given an environmental rating of A), so this regulation applies to all other emission points at the facility.

6NYCRR 212 .4

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

6NYCRR 220 .2 (b)

The particulate emission rate from a portland cement kiln or clinker cooler may not exceed in 0.05 grains per standard cubic foot of gas on a dry basis for a process weight per hour in excess of 100,000 pounds.

6NYCRR 220 .4 (c)

Part 220 applies to all Portland Cement plants regardless of size. Part 220.4(c) lists the parts of the plant that this particular requirement applies to.

6NYCRR 220 .4 (d)

No person will cause or allow emissions to the outdoor atmosphere that have an average six-minute opacity of 20 percent or more, except uncombined water, from any other confined processes at a portland cement plant.

6NYCRR 220 .5 (a)

The owner or operator of any portland cement dust dump will operate such dust dump in a manner which will minimize the horizontal dimensions of the working face.

6NYCRR 220 .5 (b)

In cases where the dump is within 1,500 feet of any receptor, the owner and/or operator must seal the dust dump either by crusting or backfill twice yearly.

6NYCRR 220 .5 (c)

If dumping procedures do not provide adequate protection from dust reentrainment, the owner and/or operator must install a windbreak. If visible emissions still reach the property line, the owner and/or operator must precondition the waste dust.

6NYCRR 220 .6 (a)

A portland cement kiln may fire fuel which exceeds the fuel sulfur limitations of Part 225 provided it can be demonstrated that the resultant sulfur dioxide emissions that occur do not exceed the rate that would result through the use of fuels which meet the limits mandated by Part 225. (NOTE: This may be allowed because a certain amount of sulfur is retained in the clinker and is not emitted into the atmosphere)

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6NYCRR 220.6 (b) (1)

A compliance plan identifying reasonably available control technology (RACT) for NO_x emissions from kilns must be submitted by 10/20/94. If the kiln(s) do not have RACT, a schedule for installation must be included in the plan. RACT must be implemented by 5/31/95.

6NYCRR 220.8 (a)

Records of daily production rates, kiln feed rates, and any particulate emission measurements for any portland cement kiln or clinker cooler must be maintained on site for at least 3 years following acquisition of the data and be available for inspection. Production and feed rates should be summarized monthly.

6NYCRR 225-1.5 (b)

This regulation allows the Commissioner of NYSDEC to grant a variance from the sulfur-in-fuel limitations in Tables 1,2 or 3 of 6 NYCRR Part 225-1.2 if the source owner can demonstrate that the emissions of sulfur dioxide will be not be greater than if compliant fuel was used. The Part 225-1.2(a)(2) limit must be met as burned.

6NYCRR 225-1.8

This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to submit reports to the commissioner containing fuel analysis data, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1.

Compliance Certification

Summary of monitoring activities at LAFARGE BUILDING MATERIALS INC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
0-41000/43101/K12	record keeping/maintenance procedures	5-31
0-41000/43101/K12	continuous emission monitoring (cem)	5-32
0-41000/43101/K12	intermittent emission testing	68
0-41000/43101/K12	monitoring of process or control device parameters as surrogate	69
0-41000	intermittent emission testing	3-24
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FACILITY	monitoring of process or control device parameters as surrogate	3-5
0-41000/43101/K12	intermittent emission testing	73
FACILITY	record keeping/maintenance procedures	3-9
FACILITY	record keeping/maintenance procedures	5-19
FACILITY	record keeping/maintenance procedures	6
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	3-2
FACILITY	record keeping/maintenance procedures	3-3
0-41000/43101/K12	continuous emission monitoring (cem)	5-25
0-41000/43101/K12	record keeping/maintenance procedures	5-26



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FACILITY	record keeping/maintenance procedures	5-23
FACILITY	record keeping/maintenance procedures	34
FACILITY	record keeping/maintenance procedures	35
0-41000	monitoring of process or control device parameters as surrogate	60
FACILITY	record keeping/maintenance procedures	38
0-41000/43101/K12	continuous emission monitoring (cem)	65
0-41000/43101/K12	continuous emission monitoring (cem)	66
0-41000/43101/K12	record keeping/maintenance procedures	67
0-41000/43101/K12	work practice involving specific operations	5-28
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0-41000/43101/K12	work practice involving specific operations	5-30
FACILITY	record keeping/maintenance procedures	42

Basis for Monitoring

Monitoring conditions in this permit modification are of 5 types:

1. Permit conditions with "Continuous Emission Monitoring (CEM)": this type of monitoring involves the direct measurement of contaminant (or surrogate contaminant) emissions from an emission point using instrumentation which operates on a continuous basis.

The carbon monoxide 99 ton/yr cap condition and the carbon monoxide CEM condition are this type of monitoring.

2. Permit conditions with "intermittent emission testing": this type of monitoring involves the direct measurement of contaminant (or surrogate contaminant) emissions from an emission point on a periodic basis.

The post TDF stack testing is this type of monitoring.

3. Permit conditions with "monitoring of process or control device parameters as surrogate": this type of monitoring involves the indirect measurement of emissions via monitoring of process or control device parameters and performance on a continuous or periodic basis.

There are conditions in the existing Title V permit with this type of monitoring.

4. Permit conditions with "work practices involving specific operations": this type of monitoring involves activities where time of operation, thru put of product, thru put of raw material, or parameter of a process material thru put is being measured and represents an operating limit.

The 2.5/1.9/1.7 lb/mm BTU limits are this type of monitoring.

5. Permit conditions with "record keeping/maintenance procedures": this type of monitoring refers to

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activities involving the upkeep of records to demonstrate compliance with a requirement or the application of maintenance procedures which may be necessary to maintain acceptable operations.

The remainder of the monitoring conditions involve this type of monitoring.