

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

Facility Identification Data

Name: GLENS FALLS LEHIGH CEMENT COMPANY
Address: 120 ALPHA ROAD, OFF ROUTE 9W
City: CEMENTON
Zip: 12415

Owner/Firm

Name: GLENS FALLS LEHIGH CEMENT CO INC
Address: 313 WARREN ST
PO BOX 440
City: GLENS FALLS
State: NY Country: USA Zip: 12801
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: WILLIAM J CLARKE
Address: DIVISION OF ENVIRONMENTAL PERMITS
1150 NORTH WESTCOTT RD
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Division of Air Resources:
Name: PETER M EMPIE

Air Permitting Facility Owner Contact:
Name: RICHARD MOSS
Address: GLENS FALLS LEHIGH CEMENT CO INC
313 WARREN STREET PO BOX 440

Permit Description

Introduction

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

Summary Description of Proposed Project

THIS MODIFICATION INVOLVES INCREASED HOURS OF OPERATION FOR THE SLAG DRYER, CONVERSION OF THE ROLL PRESS, RAW MILL TO A CEMENT FINISH MILL, AND THE BIN VENT BAGHOUSE DUST FILTER INSTALLATION ON THE CEMENT STORAGE SILOS ASSOCIATED WITH THIS CONVERSION. THIS MOD ALSO REQUEST A PERMIT TO

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



CONSTRUCT A TRUCK/RAIL UNLOADING STATION WITH MATERIAL ASSOCIATED CONVEYORS AND ASSOCIATED DUST COLLECTORS.

SO2 EMISSIONS WILL BE CAPPED BELOW THE PSD TRIGGERING THRESHOLD AT 39.75 TONS PER YEAR. SO2 WILL BE LIMITED BY TAKING A LIMIT OF FUEL BURNED IN THE SLAG DRYER UNIT OF 2,742,000 GALLONS PER YEAR OF #2 FUEL OIL. BY TAKING FUEL USE AS A FEDERAL ENFORCEABLE LIMIT, ALL OTHER CONTAMINANTS EXCEPT FOR PM-10 WILL BE CAPPED BELOW PSD THRESHOLDS.

Attainment Status

GLENS FALLS LEHIGH CEMENT COMPANY is located in the town of CATSKILL in the county of GREENE.

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

THE FACILITY CONSISTS OF CEMENT FINISH GRINDING, PACKAGING, AND SHIPPING OPERATIONS, AND AN ASSOCIATED QUARRY. MAJOR EQUIPMENT INCLUDES STONE CRUSHERS, STORAGE SILOS, A ROTARY SLAG DRYER, ROLL PRESS, THREE FINISH MILLS, AND PACKAGING/BULK LOADING (FOR TRUCKS AND RAIL CARS) EQUIPMENT. THE FACILITY ALSO INCLUDES MARINE LOADING/UNLOADING OPERATIONS WHICH OCCUR AT THE FACILITY'S DOCKS. THE ALSEN PROPERTY (ADJACENT, CONTIGUOUS, AND UNDER GLENS FALL LEHIGH'S CONTROL) PROVIDES ADDITIONAL STORAGE AND

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



DOCK CAPA CITY.

Permit Structure and Description of Operations

The Title V permit for GLENS FALLS LEHIGH CEMENT COMPANY is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

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

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

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

GLENS FALLS LEHIGH CEMENT COMPANY is defined by the following emission unit(s):
Emission unit UQUARY - THIS EMISSION UNIT CONSISTS OF ALL OPERATIONS AND EQUIPMENT ASSOCIATED WITH THE FACILITY'S QUARRY. ASSOCIATED SOURCES AND EMISSION POINTS INCLUDE DRILLING/BLASTING, TRUCK LOADING/UNLOADING, STONE HAULING, STONE CRUSHING AND STONE TRANSFER OPERATIONS. EMISSIONS FROM SEVERAL PROCESSES WITHIN THE EMISSION UNIT, SUCH AS ROAD TRAFFIC AND STORAGE PILES HAVE BEEN CLASSIFIED AS 'INSIGNIFICANT' BASED ON THE REQUIREMENTS OF 6NYCRR PART 201-6.3(d)(7). sEE APPENDIX B FOR EMISSION INFORMATION.

Emission unit UQUARY is associated with the following emission points (EP):
Q0001, Q0002, Q003A

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

Process: Q01DRILLING AND BLASTING OPERATIONS WITHIN THE FACILITY'S QUARRY. THESE OPERATIONS LOOSEN STONE FROM THE QUARRY WALLS FOR FURTHER PROCESSING (CRUSHING). EMISSIONS FROM THIS PROCESS ARE INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7). THROUGHPUT INFORMATION IS N OT REQUIRED TO DETERMINE COMPLIANCE. A PORTION OF THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



Process: Q02LOADING OF QUARRIED STONE INTO TRUCKS FOR TRANSPORT TO THE CRUSHER(S). THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. EMISSIONS FROM THIS PROCESS ARE INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7). THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE.

Process: Q03EROSION OF STONE STORAGE PILES WITHIN THE QUARRY. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE.

Process: Q04UNLOADING OF STONE TRUCKS WITHIN THE QUARRY. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: Q05 is located at Building PCRUSHER - OPERATION OF PRIMARY QUARRY CRUSHER.

Process: Q06TRANSFER OF STONE FROM THE PRIMARY TO THE SECONDARY CRUSHER. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS FROM THIS PROCESS ARE FUGITIVE AND ARE INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: Q07 is located at Building SCRUSHER - OPERATION OF SECONDARY CRUSHER.

Process: Q08TRANSFER OF STONE FROM SECONDARY CRUSHER TO THE MAIN PLANT. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: Q09EROSION OF OPEN QUARRY AREAS. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE.

Process: Q10TRANSFER AND STORAGE OF QUARRY OVERBURDEN. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: Q11TRAFFIC ON THE QUARRY ROADS (PRIMARILY UNPAVED). THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE.

Emission unit UCLTRN - THE CLINKER TRANSPORT EMISSION UNIT INCLUDES ALL OPERATIONS INVOLVED WITH THE TRANSFER AND STORAGE OF CLINKER, DRIED SLAG AND CEMENT ADDITIVES TO AND WITHIN THE PROPOSED ENCLOSED CLINKER STORAGE SHED. BECAUSE THE CEMENTON FACILITY ACCEPTS CEMENT CLINKER, SLAG AND ADDITIVES PRODUCED AT OTHER FACILITIES, THESE MATERIALS CAN BE DELIVERED BY MARINE VESSEL, RAIL OR TRUCK. THE SHIP UNLOADING OPERATIONS ARE UNCHANGED FROM THE (U-SHPNG) OPERATION DESCRIBED IN THE 1997 TITLE V SUBMISSION. IN ADDITION TO ESSENTIAL FULL ENCLOSURE OF THE EXISTING PARTIALLY ENCLOSED CLINKER STORAGE HALL, AND TO AUGMENT DELIVERY OF MATERIAL, IT IS PROPOSED TO MODIFY THE EXISTING FACILITY WITH THE CONSTRUCTION OF THE ENCLOSED TRUCK AND RAIL UNLOADING FACILITY WHICH WILL BE LOCATED ON THE WEST SIDE OF THE EXISTING CLINKER STORAGE HALL BUILDING. WITH THE ENCLOSURE OF THE CLINKER HALL, THE ORIGINAL EMISSION SOURCE CLSTO AND PROCESS CL2 ARE ELIMINATED. PROCESS CLH (ADDED WITH THE 12/18/2000 PERMIT MODIFICATION) REPRESENTS THE HANDLING OF DRIED SLAG. WITH

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



THE CONSTRUCTION OF THE TRUCK AND RAIL UNLOADING FACILITY, A NEW EMISSION SOURCE (CLTRU), A NEW PROCESS (ULD) AND TWO (2) NEW EMISSION POINTS (TRUL1 AND TRUL2) ARE CREATED. THERE ARE TWO (2) EMISSION POINTS ASSOCIATED WITH THIS EMISSION UNIT. THEY ARE: TRUL1-BAGHOUSE 1 ON TWO (2) DISCHARGE HOPPERS FOR THE ENCLOSED TRUCK AND RAIL UNLOADING SHED. TRUL2-BAGHOUSE 2 ON TWO (2) DISCHARGE HOPPERS FOR THE ENCLOSED TRUCK AND RAIL UNLOADING SHED. THE TRUCK/RAIL UNLOADING OF CEMENT CLINKER, SLAG AND OTHER MATERIALS IN THE TRUCK/RAIL UNLOADING SHED ARE VENTED THROUGH FABRIC FILTER BAGHOUSES. THE EMISSIONS FROM THE ENCLOSED CLINKER HALL ARE LIMITED TO PM10 FROM THE PARTIALLY SHELTERED CLINKER HALL TRUCK ACCESS DOORS ON THE NORTH AND EAST SIDES OF THE BUILDING. ONLY PM10 EMISSIONS ARE EXPECTED FROM THE ACCESS DOORS DUE TO THE PARTIAL ENCLOSURE OF THESE OPENINGS WITH A THIRTY (30) FOOT TRUCK ACCESS HALL THAT WILL RESULT IN THE DEPOSITION OF LARGER PARTICULATE IN THE CLINKER HALL. THE ASSUMED PM10 CONTROL EFFICIENCY ATTRIBUTED TO THE ENCLOSURE OF AND ACCESS DOOR EXTENSIONS IS APPROXIMATELY 90%. THIS INCLUDES PM AND PM10 EMISSIONS FROM EMISSION SOURCES TRUL1 AND TRUL2.

Emission unit UCLTRN is associated with the following emission points (EP): CL01A, TRUL1, TRUL2

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

Process: CL1 is located at Building FINMILL - TRANSFER OF CEMENT CLINKER FROM THE CLINKER COOLER TO STORAGE (CLINKER DISCHARGE). ALSO THE UNLOADING AND TRANSFER OF CEMENT CLINKER AND OTHER SOLID MATERIALS FROM OFF SITE TO STORAGE IN THE CLINKER HALL. CONVEYORS AND ELEVATOR SYSTEM ARE CONTROLLED.

Process: CL2 EROSION OF CLINKER STORAGE IN THE SEMI ENCLOSED STRUCTURE KNOWN AS THE CRANE BAY. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: CL3 TRANSFER AND MOVEMENT OF STORED CLINKER (BY CRANE OR OTHER MECHANICAL DEVICES). THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE.

Process: CL4 EROSION OF CLINKER STORED IN OUTDOOR (NON ENCLOSED) PILES. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: CL5 THESE EMISSIONS ARE FUGITIVE.

Process: CLH TRANSFER OF DRIED SLAG FROM THE SLAG DRYER TO THE PARTIALLY ENCLOSED CLINKER HALL INTO THE FINISH MILLS.

Process: ULD TRUCK/RAIL UNLOADING OPERATIONS IN NEW TRUCK AND RAIL UNLOADING FACILITY ADJACENT TO WEST SIDE OF CLINKER HALL. EMISSIONS ARE CONTROLLED BY TWO (2) BAGHOUSE CONTROL SYSTEMS. TWO (2) OF THESE BAGHOUSES EXHAUST TO ATMOSPHERE THROUGH EMISSION POINTS TRUL1 AND TRUL2.

Emission unit UFINML - THIS EMISSION UNIT CONSISTS OF THE OPERATIONS AND EQUIPMENT INVOLVED IN THE PRODUCTION OF FINISHED PRODUCTS (CEMENT) FROM CEMENT CLINKER, SLAG, AND OTHER ADDITIVES. PROCESSES INCLUDE THE STORAGE,

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



TRANSFER AND WEIGHING OF MATERIALS. IT ALSO INCLUDES FINAL CRUSHING IN THE ROLL PRESS AND RINDING OF THESE MATERIALS WITHIN THE FACILITY'S THREE FINISH MILLS TO PRODUCE VARIOUS GRADES OF CEMENT TO MEET VARYING CUSTOMER SPECIFICATIONS. ANY OVER SIZED PARTICLES WHICH HAVE NOT BEEN GROUND TO AN ACCEPTABLE SIZE ARE RE-CIRCULATED THROUGH THE MILL SYSTEM UNTIL SIZE REQUIREMENTS ARE SATISFIED. U-FINML CONTAINS SEVEN (7) EMISSION POINTS. THEY ARE: FM001-FINISH MILL #1, FABRIC FILTERS FM01b & FM02B (SEE PHASE 1 EQUIPMENT DRAWING). FM002-FINISH MILL #2, FABRIC FILTER 0606L (SEE PHASE 2 EQUIPMENT DRAWING). FM003-FINISH MILL #2, FABRIC FILTER 0605L (SEE PHASE 2 EQUIPMENT DRAWING). FM004-FINISH MILL #2, FABRIC FILTER 0602L (SEE PHASE 2 EQUIPMENT DRAWING). FM006-FINISH MILL #3, SEPARATOR DUST COLLECTOR SDC01 (SEE PHASE 3 & 4 EQUIPMENT DRAWING). RM001- MILL SWEEP DUST COLLECTOR MSDC1 (SEE PHASE 3 & 4 EQUIPMENT DRAWING). 00054-NUISANCE DUST COLLECTOR 0054B (SEE PHASE 3 & 4 EQUIPMENT DRAWING). WITH THE PRIOR CONVERSION OF THE RAW MILL TO FINISH MILL #3 AND MODIFICATION OF THE ROLL PRESS ENABLING IT TO FEED ANY OF THREE FINISH MILLS, REDEFINING THE PROCESSES WITHIN U-FINML IS NECESSARY TO DESCRIBE PRODUCTION OPERATIONS WITHIN THE EMISSION UNIT. PROCESS WITHIN U-FINML ARE: FTR - TRANSFER OF CLINKER AND OTHER MATERIALS TO THE FACILITY'S FINISHING OPERATIONS WHICH CONSIST OF A ROLL PRESS AND THREE (3) FINISH MILLS. EMISSIONS FROM THESE OPERATIONS ARE INCLUDED IN THE CALCULATIONS OF U-CLTRN. FRP-OPERATION OF THE ROLL PRESS. F01 - OPERATION OF FINISH MILL #1. F02-OPERATIONS OF FINISH MILL #2. F03-OPERATIONS OF FINISH MILL #3. SPECIAL NOTE: BY REDEFINING THE PROCESSES FOR U-FINML AS DESCRIBED ABOVE THE PREVIOUS DESCRIPTIONS FOR PROCESS F01, F02 AND F03 HAVE BEEN CHANGED. PROCESSES F04 & RP3 HAVE BEEN ELIMINATED. ALL EMISSION POINTS, SOURCES, AND PROCESS HAVE BEEN INCLUDED IN THIS SECTION REGARDLESS IF THEY CHANGED FOR COMPLETENESS PURPOSES.

Emission unit UFINML is associated with the following emission points (EP): 00054, FM001, FM002, FM003, FM004, FM006, FM007, RM001

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

Process: F01OPERATION OF FINISH MILL #1 DURING WHICH CEMENT CLINKER, SLAG, AND OTHER ADDITIVES ARE GROUND INTO FINISHED CEMENT.

Process: F02OPERATION OF FINISH MILL #2 DURING WHICH CEMENT CLINKER, SLAG, AND OTHER ADDITIVES ARE GROUND INTO FINISHED CEMENT.

Process: F03OPERATION OF FINISH MILL #3 DURING WHICH CEMENT CLINKER, SLAG, AND ADDITIVES ARE GROUND INTO FINISHED CEMENT.

Process: F04OPERATION OF THE CLASSIFIER, WHICH RECYCLES GROUND MATERIAL UNTIL IT HAS REACHED THE PROPER SIZE, ON FINISH MILL #2.

Process: FRPOPERATIONS OF THE ROLL PRESS TO FEED FINISH MILLS #1 AND #2.

Process: FTRTRANSFER OF CLINKER AND OTHER MATERIALS TO THE FACILITY'S FINISHING OPERATIONS WHICH CONSIST OF A ROLL PRESS AND THREE (3) FINISH MILLS. EMISSIONS FROM THESE OPERATIONS ARE INCLUDED IN THE CALCULATIONS FOR U-CLTRN.

Process: RP3THE ROLL PRESS FEEDS FINISH MILL # 1 AND # 2. THE MODIFICATION TO EMISSION UNIT U-FINMIL INCLUDES MODIFYING THE ROLL PRESS TO FEED FINISH MILL # 3 AS WELL. . THIS PROCESS REPRESENTS THE OPERATION OF THE ROLL PRESS FEEDING MATERIAL TO FINISH MILL #3.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



Emission unit URMHND - THIS EMISSION UNIT CONSISTS OF THE OPERATIONS AND EQUIPMENT INVOLVED IN THE TRANSFER, STORAGE AND HANDLING OF RAW MATERIALS (INCLUDING THE STONE REMOVED FROM THE FACILITY'S QUARRY). THESE MATERIALS ARE ALL SOLIDS AND MAY CONSIST OF IRON-BEARING MATERIALS , SILICA-BEARING MATERIALS, AND OTHER MATERIALS WHICH ARE SIMILAR IN CHEMICAL AND/OR PHYSICAL COMPOSITION. ONLY THE CHANGE TO PROCESS R19 HAS BEEN INCLUDED FOR THIWS PSD APPLICATION. THIS CHANGE IS AS A RESULT OF INCREASE IN SLAG, GYPSUM AND OTHER NON-B UD MATERIAL SHIPPING AND ASSOCIATED TRUCK TRAFFIC.

Emission unit URMHND is associated with the following emission points (EP):
RC003, RC01A, RC02A

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

Process: R01TRANSFER OF STONE FROM QUARRY BELT TO MAIN PLANT STORAGE PILE. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R02EROSION OF THE MAIN PLANT STONE STORAGE PILE. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE.

Process: R03TRANSFER OF STONE FROM THE MAIN PLANT STORAGE AREA TO THE TERTIARY CRUSHER. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R04 is located at Building TCRUSHER - OPERATION OF THE TERTIARY CRUSHER.

Process: R05TRANSFER OF CRUSHED STONE TO THE STORAGE SILOS. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R06 is located at Building STSILOS - OPERATION OF STONE STORAGE SILOS. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R07UNLOADING OF RAW MATERIALS IDENTIFIED AS "BUD (BENEFICIAL USE DETERMINATION) MATERIALS" PER NYCRR 360-1.15. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R08UNLOADING OF RAW MATERIALS NOT IDENTIFIED AS "BUD MATERIALS". THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R09EROSION OF STORAGE PILES CONTAINING MATERIALS IDENTIFIED AS "BUD (BENEFICIAL USE DETERMINATION) MATERIALS" PER 6 NYCRR 360-1.15. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE.

Process: R10EROSION OF STORAGE PILES CONTAINING MATERIALS IDENTIFIED AS "NON BUD MATERIALS". THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



Process: R11TRANSFER OF RAW MATERIALS IDENTIFIED AS "BUD (BENEFICIAL USE DETERMINATION) MATERIALS" PER 6 NYCRR 360-1.15. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R12TRANSFER OF RAW MATERIALS IDENTIFIED AS "NON BUD MATERIALS" PER 6 NYCRR 360-1.15. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6 (d) (7).

Process: R13STORAGE OF MATERIALS IDENTIFIED AS "BUD (BENEFICIAL USE DETERMINATION) MATERIALS" PER 6 NYCRR 360-1.15. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R14STORAGE OF MATERIALS IDENTIFIED AS "NON BUD MATERIALS". THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THE EMISSIONS ASSOCIATED WITH THIS PROCESS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R15UNLOADING OF RAW MATERIALS IDENTIFIED AS "BUD (BENEFICIAL USE DETERMINATION) MATERIALS" PER 6 NYCRR 360-1.15 AT THE CEMENTON DOCK. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6

Process: R16UNLOADING OF RAW MATERIALS IDENTIFIED AS "NON BUD MATERIALS" AT THE CEMENTON DOCK. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R17EROSION OF STORAGE PILES AT THE CEMENTON DOCK COMPRISED OF MATERIAL IDENTIFIED AS "BUD (BENEFICIAL USE DETERMINATION) MATERIALS" PER 6 NYCRR 360-1.15. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R18EROSION OF STORAGE PILES AT THE CEMENTON DOCK COMPRISED OF MATERIAL IDENTIFIED AS "NON BUD MATERIALS" PER 6 NYCRR 360-1.15. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: R19TRAFFIC THROUGH THE MAIN PLANT AREA (BOTH PAVED AND UNPAVED ROADS). THESE EMISSIONS ARE FUGITIVE.

Emission unit UALSEN - THIS EMISSION UNIT CONSISTS OF THE OPERATIONS AND EQUIPMENT WHICH OCCUR AT THE ALSEN FACILITY. THE FACILITY IS USED PRIMARILY FOR MATERIALS AND AS A MARINE LOADING/UNLOADING SITE. THE FACILITY'S BOUNDARY IS CONTIGUOUS WITH THAT OF THE CEMENTON FACILITY AND UNDER THE CONTROL OF GLENS FALLS LEHIGH. SEVERAL PROCESSES WITHIN THIS EMISSION UNIT HAVE BEEN DESIGNATED "INSIGNIFICANT" 6 NYCRR 201-6.3(d)(7). GRANULATED BLAST FURNACE SLAG SHIPMENTS TO THE GFLC PLANT THROUGH THE ALSEN DOCK WILL INCREASE IN THE FUTURE DUE TO THE INCREASE IN HOURS OF SLAG DRYER OPERATION. THE APPLICANT REQUEST THAT THE LIMITS ON MATERIAL HANDLING OPERATIONS AT THE ALSEN DOCK WHICH WERE INCLUDED IN CONDITION 37 ON PAGE 24 OF THE TITLE V PERMIT ISSUED IN MARCH 2001 BE REMOVED. REMOVING THE PERMIT LIMITS WILL RESULT IN INCREASED FUGITIVE PM10 EMISSIONS

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



FROM THE INCREASE TRUCK TRAFFIC, BUT THEY WILL BE LIMITED BY DUST CONTROL PRACTICES, SUCH AS ROAD WATERING AND USE OF DUST SUPPRESSANTS. TRUCK TRAFFIC FOR THIS EMISSION UNIT WILL BE FROM THE BAUXITE AND SALT SHIPPING INCREASES. ALL OTHER TRUCK TRAFFIC EMISSION WILL AFFECT THE U-RMHND EMISSION UNIT AND AS SUCH THE EMISSIONS FOR THAT PROCESS WAS INCLUDED IN THAT EMISSION UNIT.

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

A0001

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

Process: A01UNLOADING OF RAW MATERIALS IDENTIFIED AS "BUD (BENEFICIAL USE DETERMINATION) MATERIALS" PER 6 NYCRR 360-1.15 AT THE ALSEN DOCK. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE.

Process: A02UNLOADING OF RAW MATERIAL IDENTIFIED AS "NON BUD (BENEFICIAL USE DETERMINATION) MATERIALS" AT THE ALSEN DOCK. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7). THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE.

Process: A03TRANSFER OF RAW MATERIALS IDENTIFIED AS "BUD (BENEFICIAL USE DETERMINATION) MATERIALS" PER 6 NYCRR 360-1.15 FROM THE ALSEN DOCK TO ALSEN STORAGE. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201.6.3(d)(7).

Process: A04TRANSFER OF RAW MATERIALS IDENTIFIED AS "NON BUD MATERIALS" FROM THE ALSEN DOCK TO ALSEN STORAGE. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: A05Erosion of storage piles of raw materials identified as "BUD (Beneficial Use determination) Materials" per 6 NYCRR 360-1.15. Throughput information is not required to determine compliance. These emissions are fugitive.

Process: A06EROSION OF OUTDOOR STORAGE PILES OF RAW MATERIALS IDENTIFIED AS "NON BUD MATERIALS". THESE EMISSIONS ARE FUGITIVE.

Process: A07 is located at Building ALSENSILOS - INDOOR STORAGE AND HANDLING OF RAW MATERIALS IDENTIFIED AS "BUD (BENEFICIAL USE DETERMINATION) MATERIAL" PER 6 NYCRR 306-1.15. THESE EMISSIONS ARE INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: A08 is located at Building ALSENSILOS - INDOOR STORAGE AND HANDLING OF RAW MATERIALS IDENTIFIED AS "NON BUD MATERIALS" THESE EMISSIONS ARE INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: A09TRAFFIC AT THE ALSEN SITE, INCLUDING VEHICLES TRANSPORTING RAW MATERIALS FROM THE DOCK AREA TO THE STORAGE AREA.

Emission unit USGDY - A NO.2 OIL-FIRED ROTARY SLAG DRYER WILL DRY GRANULATED BLAST FURNACE SLAG FROM APPROXIMATELY 17% TO 0.1% MOISTURE PRIOR TO PROCESSING. THE DRYER FEED RATE WILL BE APPROXIMATELY 75 TONS PER HOUR. THE EMISSIONS FROM THE SLAG DRYER WILL BE DISCHARGED THROUGH A CYCLONE COLLECTOR FOLLOWED BY A FABRIC FILTER BAGHOUSE. THE DRYER IS EQUIPPED WITH 2 BURNERS EACH RATED AT 32 MMBTU PER HOUR HEAT INPUT

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



LOCATED AT OPPOSITE ENDS OF THE DRYER WITH EMISSIONS TAKEN OFF THE CENTER OF THE DRUM. WITH THE TOTAL ENCLOSURE OF THE CLINKER HALL EMISSION POINTS SD009 THROUGH SD013 ARE ELIMINATED.

Emission unit USGDRY is associated with the following emission points (EP): SD008, SD009, SD010, SD011, SD012, SD013

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

Process: CVR is located at 300 FT W OF KILN& CH - THESE PROCESSES INCLUDE THE SHIP UNLOADING TO THE SLAG STORAGE STAGING AREA, STORAGE PILES, TRUCK AND FRONT END LOADER ROAD DUST, SLAG FEED HOPPER AND THE BELT CONVEYORS THAT MOVE THE WET METAL SLAG THROUGH THE LUMP BREAKER TO THE ROTARY SLAG DRYER. THIS PROCESS ALSO INCLUDES THE BUCKET ELEVATOR AND BELT CONVEYOR SYSTEM THAT MOVES THE DRIED SLAG TO THE CLINKER HALL FOR BLENDING WITH CLINKER AND OTHER ADDITIVES. THESE SOURCES ARE FUGITIVE EMISSIONS AND INCLUDE EMISSION POINTS SF001 THROUGH SF007.

Process: DRYTHE OIL-FIRED ROTARY SLAG DRYER WILL DRY WET METAL SLAG THAT IS DELIVERED TO THE FACILITY. THE UNIT IS RATED AT A WET SLAG THROUGHPUT OF 90 TONS PER HOUR FEED WITH AN ANTICIPATED DRIED SLAG OUTPUT OF NOMINALLY 75 TONS PER HOUR. TWO OPPOSING BURNERS INSTALLED ON THE ENDS OF THE DRYER ARE EACH RATED TO FIRE 32 MMBTU PER HOUR. THE DISCHARGE FROM THE ROTARY DRYER WILL PASS THROUGH A PRE-CLEANING CYCLONE FOLLOWED BY A FABRIC FILTER BAGHOUSE WITH A COMBINED PARTICULATE REMOVAL OF 99.9% OR BETTER. THE AIR CLEANING SYSTEM IS DESIGNED TO EASILY ACCOMMODATE AN AIR FLOW OF 55000 DSCFM WHICH WILL DISCHARGE TO EMISSION POINT SD008. THE TWO BURNERS HAVE A COMBINED RATED BURNING CAPACITY OF 457 GALLONS PER HOUR. FUEL USE WILL BE USED TO LIMIT THE HOURS OF OPERATION TO KEEP SO2 EMISSIONS BELOW THE PSD TRIGGERING THRESHOLD OF 40 TONS. A 0.2% SULFUR LIMIT WILL BE TAKEN ON ALL #2 OIL FIRED IN THIS UNIT.

Emission unit USHPNG - THIS EMISSION UNIT CONSISTS OF THE OPERATIONS AND EQUIPMENT INVOLVED IN THE TRANSFER, STORAGE, PACKAGING, AND SHIPPING OF FINISHED PRODUCT. FINISHED PRODUCT MAY BE SHIPPED VIA RAILCAR, TRUCKS, MARINE VESSEL OR PACKAGED BY THE FACILITY'S BAGGING EQUIPMENT. CEMENT MAY ALSO BE DELIVERED TO THE FACILITY VIA MARINE VESSEL AND TRANSFERRED TO STORAGE TO AWAIT SHIPMENT. ONE OF THE PROCESSES IN THIS EMISSION UNIT HAS BEEN DESIGNATED AS "INSIGNIFICANT" PER NYCRR 201-6.3(d)(7). STACK PARAMETER INFORMATION FOR PREVIOUSLY PERMITTED EMISSION POINTS NS016, NS017, OS007, & OS008 HAS BEEN CORRECTED; THESE CORRECTIONS DO NOT IMPACT PREVIOUSLY SUBMITTED EMISSIONS DETERMINATIONS. THIS MODIFICATION REFLECTS THE REMOVAL OF THE HOURS OF OPERATION LIMITATION IN CONDITION 1-16, ITEM 1-16.2 IN THE STATE FACILIRT AIR PERMIT ISSUED ON 03/16/2001 AS MODIFIED AND INCLUDED IN CONDITION 52, ITEM 52.2 OF THE TITLE V PERMIT ISSUED 10/18/2001. THE HOURS OF OPERATION OF THE NEW MANIFOLD BAGHOUSE ASSOCIATED WITH STOEAAGE SILOS # 52 AND # 53 SHALL BE UNLIMITED, (8,760 HOURS PER YEAR). PROCESS EMISSIONS SUMMARY INFORMATION REPRESENTS EMISSIONS AT THIS LEVEL.

Emission unit USHPNG is associated with the following emission points (EP): BL001, BL002, NS001, NS002, NS003, NS004, NS005, NS006, NS007, NS008, NS009, NS010,

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



NS011, NS012, NS013, NS014, NS015, NS016, NS017, NS01A, OS001, OS002, OS003, OS004, OS005, OS006, OS007, OS008, PH001, PH002, PH003, PH004

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

Process: S01 is located at Building NEWSILOS - OPERATION OF THE FACILITY'S EAST STORAGE SILOS. OPERATIONS INCLUDE FILLING, EMPTYING, AND INTER SILO TRANSFERS OF FINISHED PRODUCT.

Process: S02 OPERATION OF FACILITY'S WEST STORAGE SILOS. OPERATION INCLUDE FILLING, EMPTYING, AND INTER-SILO TRANSFERS OF FINISHED PRODUCT.

Process: S03 is located at Building OLDSILOS - OPERATION OF THE FACILITY'S OLD STORAGE SILOS. OPERATIONS INCLUDE FILLING, EMPTYING, AND INTER SILO TRANSFERS OF FINISHED PRODUCT.

Process: S04 is located at Building PACKHOUSE - OPERATION OF THE FACILITY'S PACKAGING MACHINES (3 TOTAL). THE FINISHED PRODUCT (CEMENT) IS PLACED IN BAGS FOR SHIPMENT AND SALE.

Process: S05 is located at Building NEWSILOS - TRANSFER OF FINISHED PRODUCT (CEMENT) FROM THE EAST AND WEST SILOS INTO TRUCKS AND/OR RAILCARS FOR BULK SHIPMENTS.

Process: S06 is located at Building OLDSILOS - TRANSFER OF FINISHED PRODUCT (CEMENT) FROM THE OLD SILOS INTO TRUCKS AND/OR RAILCARS FOR BULK SHIPMENT.

Process: S07 OPERATIONS OF THE PACKHOUSE PALLETIZER AND BAG FLATTENING MACHINES, USED IN CONJUNCTION WITH THE PRODUCT BAGGING EQUIPMENT. EMISSIONS FROM THIS OPERATION ARE INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: S08 is located at Building MARINELOAD - OPERATION OF THE SURGE BIN IN ASSOCIATION WITH THE LOADING/UNLOADING OF FINISHED PRODUCT (CEMENT) FROM MARINE VESSELS.

Process: S09 is located at Building MARINELOAD - TRANSFER OF FINISHED PRODUCT (CEMENT) TO AND FROM MARINE VESSELS FROM THE SURGE BIN.

Emission unit USOLID - THIS EMISSION UNIT CONSISTS OF THE EQUIPMENT AND OPERATIONS INVOLVED IN THE STORAGE, TRANSFER, AND PREPARATION OF COAL (OR OTHER SOLID MATERIALS) FOR USE IN, OR STORAGE AT THE FACILITY. PROCESSES INCLUDE MATERIAL UNLOADING, LOADING, HAULING AND PREPARATION OF THE MATERIALS (BY CRUSHING) FOR USE. SEVERAL PROCESSES WITHIN THIS EMISSION UNIT HAVE BEEN DESIGNATED "INSIGNIFICANT" PER 6 NYCRR 201-6.3 (d) (7). SEE APPENDIX B FOR EMISSION INFORMATION.

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

C001A

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

Process: SF1 UNLOADING OF COAL AND OTHER SOLID MATERIAL (FROM TRUCK, RAIL AND MARINE VESSELS) TO STORAGE. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: SF2 WIND EROSION OF COAL AND OTHER SOLID MATERIAL STORAGE PILES AND AREAS. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: SF3 TRANSFER OF COAL FROM THE COAL AND OTHER SOLID MATERIAL

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



STORAGE PILES TO THE FEED HOPPER. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: SF4TRANSFER OF COAL FROM THE FEED HOPPER TO THE COAL MILL. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: SF5 is located at Building KILN - OPERATION OF THE COAL MILL AND TRANSFER OF THE CRUSHED FUEL INTO THE KILN. THE UNIT OPERATES UNDER NEGATIVE PRESSURE; ITS EMISSIONS ARE INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: SF6UNLOADING, STORAGE, AND TRANSFER OF WHOLE TIRES USED AS A SUPPLEMENTAL FUEL FOR THE KILN. THROUPTHROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Emission unit URKILN - THIS EMISSION UNIT CONSISTS OF THE OPERATIONS AND EQUIPMENT INVOLVED IN THE PRODUCTION OF CEMENT CLINKER IN THE FACILITY'S ROTARY KILN. PROCESSES INCLUDE THE WEIGHING AND TRANSFER OF RAW FEED, OPERATION OF THE KILN, AND THE TRANSFER OF EXCESS CEMENT KILN DUST (PRODUCED BY THE PROCESS) FOR ON SITE STORAGE OR SALE. SEVERAL PROCESSES WITHIN THIS EMISSION UNIT HAVE BEEN DESIGNATED "INSIGNIFICANT" PER 6 NYCRR 201-6.3 (d) (7). SEE APPENDIX B FOR EMISSION INFORMATION.

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

CC001, K0001, K0002, K0003, K0004, K005A

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

Process: K01 is located at Building KILN - TRANSFER OF RAW FEED (SLURRY) FROM THE SLURRY STORAGE TANKS TO THE KILN. DUE TO THE HIGH WATER CONTENT OF THE RAW FEED, EMISSIONS FROM THIS OPERATION ARE MINIMAL AND INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: K02 is located at Building KILN - OPERATION OF THE ROTARY KILN. WITHIN THE KILN THE RAW FEED IS PROCESSED INTO CEMENT CLINKER AT TEMPERATURES IN EXCESS OF 2000F COAL IS USED AS THE UNIT'S PRIMARY FUEL, WITH #2 OIL USED TO PREHEAT THE UNIT. WHOLE TIRES MAY BE USED AS A SUPPLEMENTAL FUEL.

Process: K03 is located at Building COOLER - OPERATION OF THE CLINKER COOLER, WHICH COOLS THE HOT CLINKER PRIOR TO TRANSFER TO STORAGE.

Process: K04 is located at Building KILN - COLLECTION OF CEMENT KILN DUST (PRODUCED DURING THE PRODUCTION OF CLINKER IN THE KILN) FOR FUTURE USE OR STORAGE.

Process: K05 is located at Building KILN - TRANSFER OF COLLECTED KILN DUST TO TRUCKS FOR SALE OR TRANSFER TO STORAGE. EMISSIONS FROM THIS PROCESS ARE INSIGNIFICANT PER 6 NYCRR 201-6.3 (d) (7).

Process: K06THE FACILITY'S CEMENT KILN DUST LANDFILL. THE FACILITY IS PERMITTED FOR A MAXIMUM SIZE OF EIGHT ACRES. THROUGHPUT INFORMATION IS NOT REQUIRED TO DETERMINE COMPLIANCE. THESE EMISSIONS ARE FUGITIVE.

Process: K07 is located at Building KILN - OPERATION OF THE FACILITY'S ROTARY KILN USING WHOLE TIRES AS A SUPPLEMENTAL FUEL.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



Title V/Major Source Status

GLENS FALLS LEHIGH CEMENT COMPANY is subject to Title V requirements. This determination is based on the following information:

This facility is major for PM-10.

Program Applicability

The following chart summarizes the applicability of GLENS FALLS LEHIGH CEMENT COMPANY with regards to the principal air pollution regulatory programs:

| Regulatory Program | Applicability |
|--------------------------------|----------------------|
| PSD | YES |
| NSR (non-attainment) | YES |
| NESHAP (40 CFR Part 61) | NO |
| NESHAP (MACT - 40 CFR Part 63) | NO |
| NSPS | YES |
| TITLE IV | NO |
| TITLE V | YES |
| TITLE VI | NO |
| RACT | NO |
| 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: 4-1926-00001/00110 Modification Number: 1

10/08/2003



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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

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 |
| 4491 | MARINE CARGO HANDLING |

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 |
|-------------|--|
| 3-05-010-43 | MINERAL PRODUCTS COAL MINING, CLEANING & MATL HANDLING (SEE 3-05-310 FOR DIFF UNITS) Open Storage Pile: Coal |
| 3-05-010-99 | MINERAL PRODUCTS COAL MINING, CLEANING & MATL HANDLING (SEE 3-05-310 FOR DIFF UNITS) Other Not Classified |
| 3-05-006-16 | MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Clinker Transfer |
| 3-05-006-13 | MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Raw Material Grinding and Drying |
| 3-05-006-12 | MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Raw Material Transfer |
| 3-05-006-11 | MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Screening |
| 3-05-007-19 | MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Cement Load Out |
| 3-05-007-18 | MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) CEMENT SILOS |
| 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 |
| 3-05-007-15 | MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Clinker Piles |
| 3-05-007-16 | MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Clinker Transfer |
| 3-05-007-06 | MINERAL PRODUCTS |



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003

- 3-05-007-99 MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Kilns
- 3-05-007-09 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Other Not Classified
- 3-05-007-08 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Primary Crushing
- 3-05-007-12 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Raw Material Piles
- 3-05-007-07 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Raw Material Transfer
- 3-05-007-10 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Raw Material Unloading
- 3-05-020-09 MINERAL PRODUCTS
STONE QUARRYING-PROCESSING (SEE ALSO 3-05-320 FOR DIFFERENT UNITS)
Blasting: General

Facility Emissions Summary

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

| Cas No. | Contaminant Name | PTE | |
|-------------|------------------|--------|-------------------|
| | | lbs/yr | Range |
| 000630-08-0 | CARBON MONOXIDE | 13713 | |
| 0NY100-00-0 | HAP | | > 0 but < 2.5 tpy |

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



| | | |
|-------------|--------------------|-------------------|
| 007439-92-1 | LEAD (HAP) | > 0 but < 10 tpy |
| 0NY210-00-0 | OXIDES OF NITROGEN | 54852 |
| 0NY075-00-0 | PARTICULATES | >= 250 tpy |
| 0NY075-00-5 | PM-10 | >= 250 tpy |
| 007446-09-5 | SULFUR DIOXIDE | 77889.84 |
| 0NY998-00-0 | VOC | > 0 but < 2.5 tpy |

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
 - (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item H: 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 I: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 201-3.2(a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Item J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

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

Item O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



confidentiality.

Item P: 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 Q: 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 R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Item T: 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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

Item U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

Item W: 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

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 X: 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

(including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item Y: Required Emission Tests - 6 NYCRR Part 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Item AA: Open Fires - 6 NYCRR Part 215

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Item BB: 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

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 CC: 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 | Short Description | Condition |
|----------------------------------|-------------------|--------------------------|------------------|
| Facility/EU/EP/Process/ES | | | |

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



| | | | |
|---------------------|--------------------------|--|------------------|
| FACILITY | ECL 19-0301 | Powers and Duties of the Department with respect to air pollution control | 1-20 |
| U-SHPNG | 40CFR 52-A.21 | Prevention of Significant Deterioration | 53 |
| U-CLTRN | 40CFR 52-A.21(j)(2) | Best Available Control Technology (BACT) (see narrative) | 1-9 |
| U-CLTRN/-/CLH/CHALL | 40CFR 52-A.21(j)(2) | Best Available Control Technology (BACT) (see narrative) | 1-10 |
| U-CLTRN/-/ULD/CLTRU | 40CFR 52-A.21(j)(2) | Best Available Control Technology (BACT) (see narrative) | 1-11 |
| U-FINML | 40CFR 52-A.21(j)(2) | Best Available Control Technology (BACT) (see narrative) | 1-14 |
| U-SGDRY | 40CFR 52-A.21(j)(2) | Best Available Control Technology (BACT) (see narrative) | 1-16, 1-15, 1-17 |
| U-SHPNG | 40CFR 52-A.21(j)(2) | Best Available Control Technology (BACT) (see narrative) | 1-19 |
| U-FINML | 40CFR 60-F.62(c) | Portland cement plants - standard for particulate matter | 44 |
| U-SGDRY | 40CFR 60-F.62(c) | Portland cement plants - standard for particulate matter | 48 |
| FACILITY | 40CFR 68 | Chemical accident prevention provisions | 1-8 |
| FACILITY | 6NYCRR 200.7 | Maintenance of equipment. | 1-1 |
| FACILITY | 6NYCRR 201-1.4 | Unavoidable noncompliance and violations | 1-21 |
| FACILITY | 6NYCRR 201-5.3(b) | Permit Content and Terms of Issuance - permit conditions | 57 |
| FACILITY | 6NYCRR 201-6 | Title V Permits and the Associated Permit Conditions | 25, 39, 40 |
| FACILITY | 6NYCRR 201-6.5(c) | Permit conditions for Recordkeeping and Reporting of Compliance Monitoring | 1-2 |
| FACILITY | 6NYCRR 201-6.5(c)(2) | Permit conditions for Recordkeeping and Reporting of Compliance Monitoring | 1-3 |
| FACILITY | 6NYCRR 201-6.5(c)(3)(ii) | Permit conditions for Recordkeeping and Reporting of Compliance Monitoring | 1-4 |
| FACILITY | 6NYCRR 201-6.5(e) | Compliance Certification | 1-5, 1-6 |
| FACILITY | 6NYCRR 202-2.1 | Emission Statements - Applicability | 30 |
| FACILITY | 6NYCRR 202-2.5 | Emission Statements - record keeping requirements. | 31 |
| FACILITY | 6NYCRR 211.2 | General Prohibitions - air pollution prohibited. | 59, 1-22 |
| U-FINML | 6NYCRR 212.11(a) | Sampling and monitoring | 1-12 |



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003

| | | | |
|-------------------|------------------------|---|----------|
| U-ALSEN | 6NYCRR 212.3 (a) | General Process Emission Sources - emissions from existing emission sources | 41 |
| U-QUARY | 6NYCRR 212.3 (a) | General Process Emission Sources - emissions from existing emission sources | 45 |
| U-RMHND | 6NYCRR 212.3 (a) | General Process Emission Sources - emissions from existing emission sources | 46 |
| U-SOLID | 6NYCRR 212.3 (a) | General Process Emission Sources - emissions from existing emission sources | 54 |
| FACILITY | 6NYCRR 212.6 (a) | General Process Emission Sources - opacity of emissions limited | 1-7 |
| FACILITY | 6NYCRR 220.4 (c) | Opacity limits for Portland Cement processes. | 34 |
| U-FINML | 6NYCRR 220.4 (d) | Opacity limits for Portland Cement processes. | 42, 1-13 |
| U-SGDRY/SD008/DRY | 6NYCRR 225-1.2 | Sulfur in Fuel Limitations. | 1-18 |
| FACILITY | 6NYCRR 231-2.6 (a) (7) | Certification issuance | 35, 36 |

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-.7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

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 Part 201-6.5(c)

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

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

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

6NYCRR Part 201-6.5(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 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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1



10/08/2003

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.

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.

Facility Specific Requirements

In addition to Title V, GLENS FALLS LEHIGH CEMENT COMPANY has been determined to be subject to the following regulations:

40CFR 52-A.21

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

40CFR 52-A.21 (j) (2)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the **special** permit conditions, separately by the permit reviewer.

40CFR 60-F.62 (c)

Any affected facility, other than the kiln or clinker cooler may not discharge any gases which exhibit a 10% opacity or greater. This requirement is part of the Federal NSPS regulations which are applicable until the new MACT becomes effective in 2002.

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

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

6NYCRR 212 .11 (a)

OWNERS AND OPERATORS SHALL COMPLY WITH NOTIFICATION REQUIREMENTS WHEN REQUIRED BY THE DEPARTMENT TO DEMONSTRATE COMPLIANCE.

6NYCRR 212 .3 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for existing (on or

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003



before July 1, 1973) process emission sources.

6NYCRR 212 .6 (a)

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

6NYCRR 220 .4 (c)

Corrective measures must be applied to any area, parking lot, clinker gallery, railcar loading shed, conveyor tunnel, access road, stockpile, building opening or refuse disposal area, at a portland cement plant that has the potential to emit visible emissions for one continuous hour or longer

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 225-1.2

This regulation limits the amount of sulfur present in the fuel burned at the facility.

6NYCRR 231-2.6 (a) (7)

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

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6. The NYSDEC will issue certificates for the ERCs that are certified.

Compliance Certification

Summary of monitoring activities at GLENS FALLS LEHIGH CEMENT COMPANY:

| Location Facility/EU/EP/Process/ES | Type of Monitoring | Cond No. |
|---|--|-----------------|
| U-SHPNG | intermittent emission testing | 53 |
| U-CLTRN | intermittent emission testing | 1-9 |
| U-CLTRN/-/CLH/CHALL | record keeping/maintenance procedures | 1-10 |
| U-CLTRN/-/ULD/CLTRU | record keeping/maintenance procedures | 1-11 |
| U-FINML | intermittent emission testing | 1-14 |
| U-SGDRY | monitoring of process or control device parameters as surrogate | 1-15 |
| U-SGDRY | work practice involving specific operations | 1-16 |
| U-SGDRY | intermittent emission testing | 1-17 |
| U-SHPNG | intermittent emission testing | 1-19 |
| U-FINML | intermittent emission testing | 44 |

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 4-1926-00001/00110 Modification Number: 1

10/08/2003

| | | |
|-------------------|---|------|
| U-SGDRY | intermittent emission testing | 48 |
| FACILITY | record keeping/maintenance procedures | 1-1 |
| FACILITY | record keeping/maintenance procedures | 57 |
| FACILITY | record keeping/maintenance procedures | 1-4 |
| FACILITY | record keeping/maintenance procedures | 1-6 |
| FACILITY | record keeping/maintenance procedures | 30 |
| FACILITY | record keeping/maintenance procedures | 1-22 |
| FACILITY | monitoring of process or control device parameters as surrogate | 1-7 |
| U-FINML | intermittent emission testing | 1-13 |
| U-FINML | intermittent emission testing | 42 |
| U-SGDRY/SD008/DRY | record keeping/maintenance procedures | 1-18 |
| FACILITY | record keeping/maintenance procedures | 35 |
| FACILITY | record keeping/maintenance procedures | 36 |

Basis for Monitoring

BASIS FOR MONITORING:

The kiln and clinker cooler are currently shut down at this facility. A new permit would have to be issued in order for them to be restarted. Therefore there is no monitoring of the kiln and clinker cooler in this permit.

Condition # 42 -6NYCRR 220.4(d) - This condition requires the facility to meet an opacity limit of 20% for all clinker finish milling and storage processes included under emission unit U-FINMIL.

Condition # 44: - 40 CFR 60.62, NSPS Subpart F--This condition requires the facility to meet an opacity limit of 10% for all clinker milling processes at the silos under emission unit U-FINMIL

Condition # 47: - 6NYCRR 212.11(a) - This condition requires the facility to stack test the baghouse for the slag dryer in order to determine the emission rate for PM-10. This condition also declares the emission limit for PM-10 to be 0.050 grains per dscf. Testing procedures must be per 6NYCRR Part 202 and EPA Method 5.

Condition # 48: - 40CFR 60.62(c), Subpart F -- This condition requires the slag dryer baghouse to meet the opacity limit of 10% for Method 9 within 60 days of start up. Emission unit U-SGDRY

Condition # 53 - 40CFR 52.21, Subpart A - This condition requires the cement silo baghouses to meet the opacity limit of 10% for Method 9 within 60 days of start up. Emission unit U-SHPNG. Testing and reporting shall be conducted as required by 40CFR 60.8.