

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1926-00021/00040

1/3/02 08:03:21



Facility Identification Data

Name: ST LAWRENCE CEMENT CORP-CATSKILL QUARRY
Address: RT 9W
City: CATSKILL
Zip: 12414

Owner/Firm

Name: ST LAWRENCE CEMENT CO LLC
City: MONT-ROYAL
State: PQ Country: CAN Zip: H3R
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: WENDY DUBOIS

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Address: ST LAWRENCE CEMENT
ROUTE 9W / PO BOX 31

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)(2) 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 while the permit review report is based on information found in the accompanying permit, it is not an enforceable document and therefore, has no legal standing.

Summary Description of Proposed Project

THIS APPLICATION IS FOR AN INITIAL TITLE V PERMIT FOR A PORTLAND CEMENT MANUFACTURING FACILITY.

Attainment Status

ST LAWRENCE CEMENT CORP-CATSKILL QUARRY 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.)

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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

ST. LAWRENCE CEMENT COMPANY'S CATSKILL, NEW YORK FACILITY LIES ON THE WEST BANK OF THE HUDSON RIVER IN GREENE COUNTY. THE SITE HAS BEEN USED FOR CEMENT MANUFACTURE BY A SUCCESSION OF COMPANIES SINCE 1907. THE EXISTING WET PROCESS PLANT WAS BUILT IN 1964. INDEPENDENT CEMENT CORPORATION OWNS APPROXIMATELY 2200 ACRES OF LAND INCLUDING THE 50 ACRE AREA ON THE EAST SIDE OF NEW YORK ROUTE 9W WHERE THE PLANT IS LOCATED AND THE QUARRY WHICH IS LOCATED ON THE WEST SIDE OF ROUTE 9W. THE CATSKILL FACILITY IS A WET PROCESS PORTLAND CEMENT PLANT UTILIZING A SOLID, LIQUID, AND GASEOUS FUEL FIRED KILN. LIMESTONE MINED AT THE QUARRY IS CRUSHED AND COMBINED WITH OTHER RAW MATERIALS AND WATER TO FORM A SLURRY WHICH IS FED TO THE KILN. AFTER THE BURNING PROCESS, GYPSUM I

Permit Structure and Description of Operations

The Title V permit for ST LAWRENCE CEMENT CORP-CATSKILL QUARRY 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,

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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.

ST LAWRENCE CEMENT CORP-CATSKILL QUARRY is defined by the following emission unit(s):
Emission unit U000D8 - PRODUCT WITHDRAWAL FROM C SILOS INTO TRUCKS AND BULK TRUCK/RAILCAR LOADING.

Emission unit U000L5 - PRODUCT PACKAGING MACHINES.

Emission unit U000L5 is associated with the following emission points (EP):
000L5, 102L5

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

Process: C03 is located at 1, Building PACKHOUSE - PRODUCT PACKAGING.

Emission unit U000R8 - RAW MATERIAL TRANSFER.

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

Process: R16 is located at Building TUNNEL - RAW MATERIAL FEEDERS/BELTS (3 TRANSFER POINTS): VIBRATING FEEDERS R4, 1R6 AND 2R6 TO BELT 1R8; BELT 1R8 AND VIBRATING FEEDER 1R7 TO BELT 2R8; BELT 2R8 AND VIBRATING FEEDER 2R7 TO BELT R10.

Emission unit U000W7 - COAL/SOLID FUEL TRANSFER FROM RAILCAR TO 1W10 BELT.

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

Process: B01 is located at Building RAILUNLD - COAL/SOLID FUEL RAILCAR UNLOADING AT HOPPER.

Process: B02 is located at Building COVCVYR - COAL/SOLID FUEL HOPPER DISCHARGE ONTO BELT W7.

Process: B03 is located at Building COVCVYR - COAL/SOLID FUEL DISCHARGE FROM BELT W7 TO BELT 1W10.

Emission unit U00A11 - MASONRY/SPECIALTY STONE TRANSFER/STORAGE.

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

Process: R04 is located at 1, Building MASSIOLBLD - SCREEN A8 DISCHARGE TO MASONRY/SPECIALTY STONE STORAGE BIN.

Process: R07 is located at Building OUTSIDE - DISCHARGE FROM RECLAIM HOPPER ONTO BELT 1W10.

Process: R08 is located at Building OUTSIDE - DISCHARGE FROM MASONRY/SPECIALTY STONE STORAGE BIN ONTO BELT A11.

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Process: R10 is located at Building OUTSIDE - DISCHARGE FROM BELT A11 ONTO BELT 1W10.
Process: R11 is located at Building OUTSIDE - DISCHARGE FROM MASONRY/SPECIALTY STONE STORAGE BIN INTO HAUL TRUCKS.

Emission unit U00A14 - WOBBLER FEEDER.

Emission unit U00A14 is associated with the following emission points (EP):
00A14

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

Process: R02 is located at 1, Building SECCRUSH - DISCHARGE OF BELT A4 TO WOBBLER FEEDER.

Emission unit U00D13 - PRODUCT TRANSFER INTO D STORAGE SILOS.

Emission unit U00D13 is associated with the following emission points (EP):
00D13, 20D13

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

Process: C01 is located at Building OUTSIDE - PRODUCT TRANSFER INTO D STORAGE SILOS.

Emission unit U00D26 - PRODUCT WITHDRAWAL FROM D STORAGE SILOS.

Emission unit U00D26 is associated with the following emission points (EP):
00D26

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

Process: C02 is located at Building OUTSIDE - PRODUCT WITHDRAWAL FROM D STORAGE SILOS.

Emission unit U00D36 - PRODUCT TRANSFER INTO C STORAGE SILOS.

Emission unit U00D36 is associated with the following emission points (EP):
00D36

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

Process: C05 is located at Building OUTSIDE - PRODUCT TRANSFER INTO C SILOS.

Emission unit U00F40 - FINISH MILL FEED ELEVATORS, FINISH MILLS, COOLERS AND HOPPERS

Emission unit U00F40 is associated with the following emission points (EP):
00F38, 00F40, 20F38, 20F40

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

Process: F02 is located at 1, Building FIRING - FINISH MILL FEED ELEVATORS.

Process: F03 is located at 1, Building FIRING - FINISH MILLS.

Process: F04 is located at 1, Building FIRING - FINISH MILL AIR SEPARATORS.

Process: F05 is located at 1, Building FIRING - CEMENT SURGE HOPPERS/PUMPS.

Emission unit U00F52 - FINISH MILL FEEDERS/SCREWS.

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

Process: F01 is located at 1, Building FIRING - DISCHARGE OF CKD BINS, CEMENT FRINGE BINS, MASONRY/SPECIALTY STONE BIN, GYPSUM/ADDITIVE BINS, AND PRODUCT STORAGE BINS TO FINISH MILL FEEDERS AND SCREWS. DRAG CONVEYOR DISCHARGE INTO FINISH MILL FEED ELEVATORS.

Process: F06HOPPER AND CONVEYOR USED FOR SUPPLYING FINISH MILL SYSTEMS WITH

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ADDITIONAL ADDITIVE MATERIALS

Emission unit U00K18 - KILN.

Emission unit U00K18 is associated with the following emission points (EP):
00K18

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

Process: K1A is located at Building OUTSIDE - KILN WITH ELECTROSTATIC PRECIPITATOR BURNING COAL.

Process: K1B is located at Building OUTSIDE - KILN WITH ELECTROSTATIC PRECIPITATOR BURNING OIL.

Process: K1C is located at Building OUTSIDE - KILN WITH ELECTROSTATIC BURNING TIRES. UP TO 20% CHIPPED TIRES MAY BE USED AS A SUBSTITUTE FUEL.

Process: K1D is located at Building OUTSIDE - KILN WITH ELECTROSTATIC PRECIPITATOR BURNING WASTE OIL GENERATED ON SITE. WASTE OIL GENERATED ON SITE WILL BE INJECTED IN THE FUEL END OF THE KILN. THE BURNING RATE WILL NOT EXCEED 15 GAL/MIN. THE AMOUNT BURNED WILL NOT EXCEED 5,000 GALLONS DURING ANY 24-HOUR PERIOD.

Process: K1E is located at Building OUTSIDE - KILN WITH ELECTROSTATIC PRECIPITATOR BURNING WASTE OIL GENERATED OFF-SITE.

Process: K1F is located at Building OUTSIDE - KILN WITH ELECTROSTATIC PRECIPITATOR BURNING NATURAL GAS.

Process: K1G is located at Building OUTSIDE - KILN WITH ELECTROSTATIC PRECIPITATOR BURNING OTHER NON-HAZARDOUS FUELS INCLUDING BUT NOT LIMITED TO PAPER, WOOD, ETC. THE FACILITY WILL NOTIFY THE NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION BEFORE BURNING THESE FUELS.

Process: K1H is located at Building OUTSIDE - KILN WITH ELECTROSTATIC PRECIPITATOR BURNING COKE.

Emission unit U00K20 - CKD TRUCK LOADING THROUGH PUG MILL

Emission unit U00K20 is associated with the following emission points (EP):
03K20, 06K19, 09K20

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

Process: K04 is located at 1, Building DUSTBLDG - PUG MILL.

Process: K5A is located at 1, Building DUSTBLDG - CKD DISCHARGE INTO TRUCK.

Process: K5B is located at 1, Building DUSTBLDG - CKD TRUCK LOADING THROUGH PUG MILL.

Process: K5C is located at Building OUTSIDE - CKD SCOOP RECYCLING SYSTEM

Emission unit U00K27 - PRODUCT STORAGE SILOS.

Emission unit U00K27 is associated with the following emission points (EP):
00K27

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

Process: K12 is located at Building OUTSIDE - PRODUCT STORAGE (7 SILOS AND 2 INTERSTICES).

Emission unit U00R12 - BULK MATERIALS HANDLING/STORAGE.

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

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Process: B11 is located at Building OUTSIDE - DISCHARGE FROM COAL/COKE/SOLID FUEL BLENDING HOPPER ONTO CONVEYOR.

Process: B14 is located at Building TUNNEL - COAL/SOLID FUEL FEEDERS/BELTS (4 TRANSFER POINTS), GYPSUM/ADDITIVE FEEDERS/BELTS (4 TRANSFER BELTS) AND CLINKER RECLAIM.

Process: B15 is located at 1, Building FIRING - BULK MATERIAL ELEVATOR - COAL/SOLID FUEL, GYPSUM/ADDITIVE FEEDERS/BELTS (4 TRANSFER POINTS) AND BULK MATERIAL ELEVATOR - MASONRY/SPECIALTY STONE.

Emission unit U00T10 - PRODUCT TRANSFER TO RIVER BUNKER SILOS.

Emission unit U00T10 is associated with the following emission points (EP):

00T10

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

Process: C09 is located at Building OUTSIDE - PRODUCT TRANSFER TO RIVER BUNKER SILOS.

Emission unit U00W10 - CHUTE DISCHARGE ONTO BELT 1W10.

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

Process: R05 is located at 1, Building MASSIOLBLD - CONVEYOR TRANSFER BELT A7 TO BELT 1W10.

Emission unit U00W11 - RAW MATERIAL TRANSFER TOWER.

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

Process: B05 is located at Building TRANTOWER - BULK MATERIAL TRANSFER TOWER WHICH TRANSFERS COAL/SOLID FUEL FROM BELT 1W10 TO BELT 1W13.

Process: R13 is located at Building TRANTOWER - RAW MATERIAL TRANSFER TOWER CONTAINING TRANSFER POINT OF BELT 1W10 TO BELT 1W13.

Emission unit U00W14 - CRANEWAY STORAGE HALL TRIPPER/TROWER.

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

Process: B06 is located at Building COVCRNWAY - BULK MATERIAL IS TRANSFERRED TO STORAGE BINS VIA THE TRIPPER/TROWER.

Process: R14 is located at Building COVCRNWAY - RAW MATERIALS ARE TRANSFERRED FROM BELT 1W13 TO STORAGE BINS VIA THE TRIPPER/TROWER.

Emission unit U00W31 - TRANSFER OF GYPSUM/ADDITIVES FROM ELEVATORS TO GYPSUM/ADDITIVE BINS. TRANSFER OF MASONRY/SPECIALTY STONE FROM ELEVATORS TO MASONRY/SPECIALTY STONE BINS.

Emission unit U00W31 is associated with the following emission points (EP):

00W31, 00W32

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

Process: B17 is located at 1, Building FIRING - TRANSFER OF GYPSUM/ADDITIVE FROM ELEVATOR TO DRAG CONVEYOR 1W28. TRANSFER OF GYPSUM/ADDITIVE FROM DRAG CONVEYOR 1W28 TO DRAG CONVEYOR 1W29. TRANSFER OF GYPSUM/ADDITIVE FROM DRAG CONVEYOR 1W29 TO GYPSUM/ADDITIVE BINS.

Process: B18 is located at 1, Building FIRING - TRANSFER OF MASONRY/SPECIALTY STONE FROM ELEVATOR TO DRAG CONVEYOR 1W28. TRANSFER OF MASONRY/SPECIALTY

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STONE FROM DRAG CONVEYOR 1W28 TO DRAG CONVEYOR 1W29. TRANSFER OF MASONRY/SPECIALTY STONE FROM DRAG CONVEYOR 1W29 TO MASONRY/SPECIALTY STONE BINS.

Emission unit U00W33 - FLYSAH/RAW MATERIAL BIN

Emission unit U00W33 is associated with the following emission points (EP):
00W33

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

Process: B19 is located at 1, Building FIRING - CKD STORAGE BIN.

Emission unit U00W46 - FLY ASH/RAW MATERIALS STORAGE BINS.

Emission unit U00W46 is associated with the following emission points (EP):
00W46

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

Process: B21 is located at 1, Building FIRING - FLY ASH/RAW MATERIALS STORAGE.

Emission unit U06K50 - CLINKER HANDLING/CLINKER COOLER.

Emission unit U06K50 is associated with the following emission points (EP):
06K50

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

Process: K10 is located at Building FIRING - CLINKER COOLER.

Process: K11 is located at 1, Building FIRING - CLINKER CONVEYORS/ELEVATOR - 5
TRANSFER POINTS: CLINKER COOLER TO DRAG CONVEYORS 9/10 K3; DRAGS 9/10 K3 TO
DRAG K22; DRAG K22 TO ELEVATOR 1K23; ELEVATOR 1K23 TO ELEVATOR 2K23;
ELEVATOR 2K23 TO SCREWS 1/2/3/4K25.

Process: K13 is located at 1, Building FIRING - AUXILIARY CLINKER HANDLING/STORAGE (3
TRANSFER POINTS) ; DRAG K22 TO DRAG K28; DRAG K28 TO DRAG ELEVATOR K29;
ELEVATOR K29 TO BELT K33.

Process: K14 is located at 1, Building FIRING - LOADING CLINKER TO TRUCKS/clinker kickout
bin.

Emission unit UCKDBN - CKD HANDLING/UNLOADING.

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

Process: K02 is located at Building OUTSIDE - CKD FEEDERS/SCREWS.

Process: K03 is located at Building OUTSIDE - CKD ELEVATOR LOADING TO BIN.

Emission unit UCOLML - COAL/SOLID FUEL MILL.

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

Process: K09 is located at 1, Building FIRING - COAL/SOLID FUEL MILL.

Emission unit UFLASH - CKD/RAW MATERIAL/PRODUCTS SILOS.

Emission unit UFLASH is associated with the following emission points (EP):
BSILO, BTRUK

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

Process: FA1 is located at Building OUTSIDE - CKD /FLY ASH/RAW MATERIALS/PRODUCTS
SILOS LOADING AND UNLOADING.

Process: FA2CKD SILO LOADING AND UNLOADING

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Emission unit UPILE1 - OUTSIDE STORAGE PILES INCLUDING, BUT NOT LIMITED TO: LIMESTONE STORAGE PILE, RAW MATERIAL STORAGE PILES, COAL/SOLID FUEL STORAGE PILE AND GYPSUM/ADDITIVE STORAGE PILE.

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

Process: B08 is located at Building OUTSIDE - FUGITIVE EMISSIONS FROM COAL/SOLID FUEL STORAGE PILE.

Process: B10 is located at Building OUTSIDE - FUGITIVE EMISSIONS FROM GYPSUM/ADDITIVE STORAGE PILE.

Process: R06 is located at Building OUTSIDE - FUGITIVE EMISSIONS FROM LIMESTONE STORAGE PILES.

Process: R15 is located at Building OUTSIDE - FUGITIVE EMISSIONS FROM RAW MATERIAL STORAGE PILE.

Emission unit UPILE2 - INSIDE STORAGE PILES INCLUDING, BUT NOT LIMITED TO: COAL/SOLID FUEL STORAGE PILE AND GYPSUM/ADDITIVE STORAGE PILE.

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

Process: B12 is located at Building COVCRNWAY - FUGITIVE EMISSIONS FROM COAL/SOLID FUEL STORAGE PILE.

Process: B13 is located at Building COVCRNWAY - FUGITIVE EMISSIONS FROM GYPSUM/ADDITIVE STORAGE PILE.

Emission unit UPILE3 - CKD LANDFILL.

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

Process: K08 is located at Building OUTSIDE - FUGITIVE EMISSIONS FROM CKD LANDFILL.

Emission unit UQUARR - QUARRY: RAW MATERIAL LOADING/UNLOADING.

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

Process: Q03 is located at Building QUARRY - QUARRY: LOADING HAUL TRUCKS.

Process: Q05 is located at Building QUARRY - RAW MATERIAL UNLOADING.

Emission unit URAWML - RAW MILL.

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

Process: G01 is located at 1, Building FIRING - RAW MATERIAL BELT DISCHARGE TO ELEVATOR.

Process: G02 is located at 1, Building FIRING - FLY ASH/RAW MATERIAL FEEDER/DISCHARGE.

Process: G03 is located at 1, Building FIRING - RAW MATERIAL ELEVATOR DISCHARGE.

Process: G04 is located at 1, Building FIRING - RAW MILL.

Emission unit UROADS - HAUL ROADS.

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

Process: B07 is located at FLY ASH/CKD BIN, Building OUTSIDE - HAUL ROAD: COAL/SOLID FUEL FROM STORAGE HALL TO STORAGE PILE.

Process: B09 is located at CKD LANDFILL, Building OUTSIDE - HAUL ROAD: GYPSUM/ADDITIVE FROM PLANT ENTRANCE TO STORAGE PILE.

Process: B22 is located at FLY ASH/CKD BIN, Building OUTSIDE - HAUL ROAD: CKD TO PUMP POSITION AND FLY ASH/RAW MATERIAL/PRODUCT TO PUMP POSITION.



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Process: C04 is located at PACKAGING BUILDING, Building OUTSIDE - HAUL ROAD: PACKAGED PRODUCT TO PLANT ENTRANCE.

Process: C08 is located at CEMENT STORAGE SILOS, Building OUTSIDE - HAUL ROAD: BULK PRODUCT TRUCKS TO PLANT ENTRANCE.

Process: K06 is located at CKD LANDFILL, Building OUTSIDE - HAUL ROAD: CKD TO LANDFILL.

Process: K15 is located at CLINKER STORAGE BINS, Building OUTSIDE - HAUL ROAD: PRODUCT FROM BINS TO PLANT ENTRANCE.

Process: Q04 is located at QUARRY, Building OUTSIDE - HAUL ROADS FROM QUARRY TO PRIMARY CRUSHER.

Process: R12 is located at MASONRY STONE BIN, Building OUTSIDE - HAUL ROADS - MASONRY/SPECIALTY STONE.

Emission unit U000A1 - PRIMARY CRUSHING.

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

Process: R01 is located at 1, Building PRIMCRUSH - PRIMARY CRUSHING.

Emission unit U000A7 - Secondary crusher and discharge of secondary crusher onto belt A7

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

Process: R03 is located at 1, Building SECCRUSH - THIS PROCESS CONSISTS OF SECONDARY CRUSHING AND THE DISCHARGE OF THE SECONDARY CRUSHER ONTO BELT A7. THE SOURCE FOR THIS PROCESS IS "SCRSH"

Title V/Major Source Status

ST LAWRENCE CEMENT CORP-CATSKILL QUARRY is subject to Title V requirements. This determination is based on the following information:

THE ST. LAWRENCE CEMENT COMPANY'S CATSKILL FACILITY IS A MAJOR SOURCE AND REQUIRES A TITLE V PERMIT BECAUSE THE FACILITY HAS AIR EMISSIONS GREATER THAN THE TITLE V THRESHOLDS

Program Applicability

The following chart summarizes the applicability of ST LAWRENCE CEMENT CORP-CATSKILL QUARRY with regards to the principal air pollution regulatory programs:

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



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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)

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

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appliances.

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

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
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
3-05-006-13	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Raw Material Grinding and Drying
3-05-007-07	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Raw Material Unloading

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3-05-007-08 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Raw Material Piles

3-05-007-09 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Primary Crushing

3-05-007-10 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET
PROCESS)
Secondary Crushing

3-05-007-12 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Raw Material Transfer

3-05-007-14 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Clinker Cooler

3-05-007-16 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Clinker Transfer

3-05-007-17 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Clinker Grinding

3-05-007-18 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
CEMENT SILOS

3-05-007-29 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
FINISH GRINDING MILL AIR SEPARATOR

3-05-007-99 MINERAL PRODUCTS
MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
Other Not Classified

3-05-020-06 MINERAL PRODUCTS
STONE QUARRYING-PROCESSING (SEE ALSO 3-05-320 FOR DIFFERENT
UNITS)

3-05-020-11 Miscellaneous Operations: Screen/Convey/Handling
MINERAL PRODUCTS
STONE QUARRYING-PROCESSING (SEE ALSO 3-05-320 FOR DIFFERENT
UNITS)
Hauling

3-05-101-03 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS CONVEYORS
Coal

3-05-101-98 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS CONVEYORS
Mineral: Specify in Comments

3-05-101-99 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS CONVEYORS
Other Not Classified

3-05-102-02 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS STORAGE BINS
Cement

3-05-102-99 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS STORAGE BINS
Other Not Classified

3-05-103-03 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS OPEN STOCKPILES
Coal

3-05-103-05 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS OPEN
STOCKPILES
Limestone

3-05-103-98 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS OPEN STOCKPILES
Mineral: Specify in Comments

3-05-104-03 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS UNLOADING OPERATION
Coal

3-05-104-99 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS UNLOADING OPERATION

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3-05-105-98	Other Not Classified MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS LOADING OPERATION
3-05-105-99	Mineral: Specify in Comments MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS LOADING OPERATION
3-05-999-99	Other Not Classified MINERAL PRODUCTS MINERAL PRODUCTS - OTHER NOT DEFINED
3-90-002-89	Specify in Comments Field IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE GENERAL (BITUMINIOUS)
3-90-005-89	IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE General
3-90-006-02	IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE Cement Kiln/Dryer
3-90-008-99	IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE GENERAL: COKE
3-90-013-89	IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE General
3-99-999-94	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified

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
000092-52-4	1, 1 BIPHENYL(HAP)	> 0	but < 10 tpy

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000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER(HAP)	> 0 but < 10 tpy
007440-38-2	ARSENIC(HAP)	> 0 but < 10 tpy
000071-43-2	BENZENE(HAP)	> 0 but < 10 tpy
007440-43-9	CADMIUM(HAP)	> 0 but < 10 tpy
000075-15-0	CARBON DISULFIDE(HAP)	> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 250 tpy
000108-90-7	CHLOROBENZENE(HAP)	> 0 but < 10 tpy
007440-47-3	CHROMIUM(HAP)	> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE(HAP)	> 0 but < 10 tpy
0NY100-00-0	HAP	>= 2.5 tpy but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE(HAP)	> 0 but < 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
000074-83-9	METHYL BROMIDE(HAP)	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE(HAP)	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE(HAP)	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy
000108-95-2	PHENOL(HAP)	> 0 but < 10 tpy
0NY075-00-5	PM-10	>= 250 tpy
007782-49-2	SELENIUM(HAP)	> 0 but < 10 tpy
000100-42-5	STYRENE(HAP)	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy
000108-88-3	TOLUENE(HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 2.5 tpy but < 10 tpy
001330-20-7	XYLENE, M, O & P MIXT.(HAP)	> 0 but < 10 tpy

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	40CFR 60-A.4	General provisions - Address	41
U-06K50	40CFR 60-F.62(b)	Portland cement plants - standard for particulate matter	111
FACILITY	40CFR 60-F.62(c)	Portland cement plants - standard for particulate matter	42
FACILITY	40CFR 63-LLL.	Portland Cement Manufacturing NESHAP	43
U-00K18	40CFR 63-LLL.1343(b)(1)	NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills	84
U-00K18/00K18	40CFR 63-LLL.1343(b)(2)	Standards for Kilns	96
U-00K18/00K18	40CFR 63-LLL.1343(b)(3)	Existing, reconstructed or new brownfield/major sources	97
U-00K18/00K18	40CFR 63-LLL.1344(a)	Operating Limits for kilns	98
U-00K18/00K18	40CFR 63-LLL.1344(b)	Operating limits for kilns	99
U-00F40/-/F04/SEP01	40CFR 63-LLL.1347	NESHAP for Portland Cement Manufacturing - Standards for raw and finish mills	75
U-00F40/-/F04/SEP02	40CFR 63-LLL.1347	NESHAP for Portland Cement Manufacturing - Standards for raw and finish mills	76
U-00F40/-/F04/SEP03	40CFR 63-LLL.1347	NESHAP for Portland Cement Manufacturing -	77

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U-00F40/-/F04/SEP04	40CFR 63-LLL.1347	Standards for raw and finish mills NESHAP for Portland Cement Manufacturing - Standards for raw and finish mills	78
U-00F40/00F38/F03/FINML	40CFR 63-LLL.1347	NESHAP for Portland Cement Manufacturing - Standards for raw and finish mills	79
U-RAWML/-/G04/RAWML	40CFR 63-LLL.1347	NESHAP for Portland Cement Manufacturing - Standards for raw and finish mills	118
FACILITY	40CFR 63-LLL.1348	NESHAP for Portland Cement Manufacturing - Standards for other affected sources	44
FACILITY	40CFR 63-LLL.1349(a)	Performance Test Requirements	45
FACILITY	40CFR 63-LLL.1349(b)(1)	Performance testing requirements	46
U-00K18	40CFR 63-LLL.1349(b)(3)	Performance testing requirements	85
FACILITY	40CFR 63-LLL.1349(c)	Performance testing requirements	47
FACILITY	40CFR 63-LLL.1349(d)	Performance testing requirements	48
FACILITY	40CFR 63-LLL.1349(e)	Performance testing requirements	49
FACILITY	40CFR 63-LLL.1350(a)	Monitoring Requirements	50, 51, 52
FACILITY	40CFR 63-LLL.1350(b)	Monitoring Requirements	53
U-00K18/00K18	40CFR 63-LLL.1350(c)(1)	Monitoring Requirements	100
U-00K18/00K18	40CFR 63-LLL.1350(c)(3)	Monitoring requirements	101
U-06K50/06K50	40CFR 63-LLL.1350(d)(1)	Monitoring Requirements	112
U-06K50/06K50	40CFR 63-LLL.1350(d)(3)	Monitoring Requirements	113
U-00K18	40CFR 63-LLL.1350(f)	Monitoring requirements	86
U-00K18/00K18	40CFR 63-LLL.1350(i)	Monitoring Requirements	102
FACILITY	40CFR 63-LLL.1350(j)	Monitoring requirements	54, 55
FACILITY	40CFR 63-LLL.1351(a)	Compliance Dates	56, 57
FACILITY	40CFR 63-LLL.1352	Additional Test Methods	58
FACILITY	40CFR 63-LLL.1353	Notification Requirements	59
FACILITY	40CFR 63-LLL.1354	Reporting Requirements	60, 61
FACILITY	40CFR 63-LLL.1355	Recordkeeping Requirements	62
FACILITY	40CFR 63-LLL.1356	Exemption from NSPS	63
FACILITY	40CFR 82-E.	Protection of Stratospheric Ozone - labelling of products using ozone depleting substances	64
FACILITY	40CFR 82-F.	Protection of Stratospheric Ozone - recycling and emissions reduction	65
FACILITY	6NYCRR 200.5	Sealing.	1
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	2
FACILITY	6NYCRR 200.7	Maintenance of equipment.	3
FACILITY	6NYCRR 201-1.10(b)	Permitting - public access to records kept for Title V permitting	8
FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	4
FACILITY	6NYCRR 201-1.5	Emergency defense	5
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	6
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of	7

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		collected contaminants to the air	
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	9
FACILITY	6NYCRR 201-3.2(b)	Exempt Activities - maintenance of control equipment	10
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	11
FACILITY	6NYCRR 201-3.3(b)	Trivial Activities - maintenance of control equipment	12
FACILITY	6NYCRR 201-5.	State Facility Permit General Provisions	119
FACILITY	6NYCRR 201-5.3(b)	Permit Content and Terms of Issuance - permit conditions	120
FACILITY	6NYCRR 201-6.	Title V Permits and the Associated Permit Conditions	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 66, 67
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	26
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	27
FACILITY	6NYCRR 201-6.5(g)	Permit shield	28
FACILITY	6NYCRR 202-1.1	Required emissions tests.	29
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.	121
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	32
U-000D8	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	68
U-000L5	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	69
U-000D13	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	71
U-000D26	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	72
U-000D36	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	73
U-00K18	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	80
U-00K20	6NYCRR 212.3(a)	General Process Emission Sources - emissions from	103

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U-00K27	6NYCRR 212.3(a)	existing emission sources General Process Emission Sources - emissions from existing emission sources	104
U-00R12	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	105
U-00T10	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	106
U-00W31	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	107
U-00W33	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	108
U-00W46	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	109
U-06K50	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	110
U-FLASH	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	114
U-QUARR	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	116
U-RAWML	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	117
U-00A14	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or modifications	70
U-00F40	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or modifications	74
FACILITY	6NYCRR 215.	Open Fires	33
U-00K18/00K18	6NYCRR 220.2(b)	Large existing kilns and clinker coolers	93
U-00K18	6NYCRR 220.4(a)	Opacity limits for Portland Cement processes.	81
FACILITY	6NYCRR 220.4(c)	Opacity limits for Portland Cement processes.	34
FACILITY	6NYCRR 220.5	Particulate emissions from dust dumps.	35
U-PILE3	6NYCRR 220.5(a)	Particulate emissions from dust dumps.	115
FACILITY	6NYCRR 220.5(b)	Particulate emissions from dust dumps.	36
FACILITY	6NYCRR 220.5(c)	Particulate emissions from dust dumps.	37
U-00K18	6NYCRR 220.6(a)	Gaseous emissions from kiln stacks.	82, 83



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FACILITY	6NYCRR 220.6(b)	Gaseous emissions from kiln stacks.	38, 39
U-00K18/00K18	6NYCRR 220.8(a)	Source monitoring.	94
U-00K18/00K18	6NYCRR 220.8(b)	Source monitoring.	95
FACILITY	6NYCRR 225-1.8	Reports, sampling and analysis.	40
U-00K18/-/K1E/00K18	6NYCRR 225-2.4	Eligibility to burn waste fuels A and B.	87, 88, 89, 90, 91
U-00K18/-/K1E/00K18	6NYCRR 225-2.7	Reports, sampling and analysis of waste fuels A and B.	92

Applicability Discussion:

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

6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

6NYCRR Part 200-.6

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

6NYCRR Part 200-.7

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

6NYCRR Part 201-1.2

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 201-1.5

An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating properly at the time, the person responsible took all reasonable steps to minimize the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

6NYCRR Part 201-1.7

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Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected contaminants to the air

6NYCRR Part 201-1.10(b)

Any permit application, compliance plan, permit, and monitoring and compliance certification report that is submitted as part of the Title V permit process must be made available to the public as per requirements set forth under 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the Clean Air Act Amendments of 1990.

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

General Provisions - this requirement applies to those permit terms and conditions which are not federally enforceable; specifies that permittees must maintain emission units and control devices in compliance with all rules; authorizes reasonable access for inspections for department representatives; requires that on-site monitoring recordkeeping be made available for review for at least 5 years.

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

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

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6NYCRR Part 201-6

General provisions for Title V permits including:

Applicable Criteria, Limits, Terms, Conditions and Standards - requires that facility operations take place in accordance with approved criteria, emission limits, terms, conditions and standards as specified in the permit and that any documents required by the federally enforceable portion of the permit be certified by a responsible official

Cessation or Reduction of Permitted Activity Not a Defense - specifies that the cessation or reduction of a permitted activity to maintain compliance is not a defense in an enforcement action

Compliance Requirements - lists the information that must be included in any required compliance monitoring records and reports; and requires; compliance with any approved compliance schedule; the submittal of risk management plans as per 112(r) of the Act if necessary; and the submittal of compliance progress reports on a semiannual basis, at a minimum

Federally-Enforceable Requirements - specifies what permit terms and conditions, in general, are federally enforceable

Fees - requires the permittee to pay any required fees

Monitoring, Related Recordkeeping and Reporting Requirements - requires all compliance monitoring and recordkeeping to be conducted according to the terms and conditions of the permit and any Q/A requirements; any monitoring or support information is to be retained for minimum of 5 years.

Permit Revocation, Modification, Reopening, Reissuance or Termination and Associated Information Submission Requirements - specifies that the permit may be modified, revoked, reopened and reissued, or terminated for cause; and the permittee must furnish information regarding the permit to the department upon reasonable request

Permit Shield - sets forth criteria under which the permit shield applies and what authority the department maintains in pursuing violations

Property Rights - specifies that the permit does not convey any property rights

Reopening Cause - sets forth criteria and procedures for reopening a permit

Right to Inspect - establishes authority whereby department representatives may enter and inspect a facility

Severability - establishes that the permit continues to be valid in instances where any provisions, parts or conditions of the permit are found to be invalid or are the subject of a challenge

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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 201-6.5(g)

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

6NYCRR Part 202-1.1

Specifies that emissions tests may be required to ascertain compliance with any air pollution codes and rules.

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

Specifies the emission statement records that must be maintained for a 5 year period.

6NYCRR Part 211-.2

General air pollution prohibition

6 NYCRR Part 211.3

Restricts the opacity of visible emissions from any air contamination source.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 82, Subpart F

Requires affected permittees to comply with the recycling and emissions reduction standards specified by this rule when using ozone depleting substances identified under Title VI of the Act. Specifically, these regulations apply to the following persons or activities:

- a. Persons opening appliances for maintenance, service, repair, or disposal
- b. Equipment used during the maintenance, service, repair, or disposal of appliances
- c. Persons performing maintenance, service, repair, or disposal of appliances
- d. Persons disposing of small appliances, motor vehicle air conditioners or MVAC's, and MVAC-like appliances
- e. Persons owning commercial or industrial process refrigeration equipment

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f. Owners/operators of appliances normally containing 50 or more pounds. If applicable, the above persons or activities may be required to comply with certain disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, ST LAWRENCE CEMENT CORP-CATSKILL QUARRY has been determined to be subject to the following regulations:

40CFR 60-A.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Enforcement and Compliance Assurance.

40CFR 60-F.62 (b)

NSPS: THIS CONDITION REQUIRES THAT THE FACILITY CLINKER COOLER DOES NOT HAVE PARTICULATE EMISSIONS IN EXCESS OF 0.10 POUNDS PER TON OF FEED TO THE KILN(DRY BASIS) AND DOES NOT EXHIBIT OPACITY OF 10 % OR GREATER. ALSO REQUIRES FACILITY TO OPRATE, CALIBRATE AND MAINTAIN A COM ON THE CLINKER COOLER.

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.

40CFR 63-LLL.

National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry.

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.).

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40CFR 63-LLL.1344 (b)

This section provides a temperature limit for affected sources.

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)

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) (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 (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 (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

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.

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113740CFR 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.

40CFR 82-E.

Subpart E of 40 CFR Part 82, requires warning statements on containers of, and products containing or manufactured with, certain ozone-depleting substances, pursuant to section 611 of the Clean Air Act Amendments of 1990. Specific requirements are detailed in sections 82.106 thru 82.124.

6NYCRR 201-3.2 (b)

The owner and/or operator of any emission source or unit that is eligible to be exempt on the basis of the use of appropriate emission control devices shall operate and maintain such devices in a manner consistent with good engineering practices. Failure to do so constitutes a violation of this Part.

6NYCRR 201-3.3 (b)

The owner and/or operator of any emission source or unit that is eligible to be considered as a trivial source on the basis of the use of appropriate emission control devices shall operate and maintain such devices in a manner consistent with good engineering practices. Failure to do so constitutes a violation of this Part.

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 .3 (a)

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

6NYCRR 212 .4 (a)

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

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.

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6NYCRR 220 .4 (a)

OPACITY LIMITS FOR PORTLAND CEMENT PLANTS

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 .5

PARTICULATE EMISSIONS FROM DUST DUMPS

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)

6NYCRR 220 .6 (b)

RACT FOR PORTLAND CEMENT PLANTS

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 220 .8 (b)

A continuous opacity monitor must be installed, maintained and calibrated for any dry process cement kiln or any clinker cooler subject to the opacity requirements of this Part.

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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.

6NYCRR 225-2.4

This regulation sets the limits for the compounds that may be in Waste Fuel A. These are: PCB less than 50 parts per million (ppm); Total Halogens less than 1,000 ppm; Sulfur less than the limits in Part 225-1; Lead less than 250 ppm; and a minimum gross heat content of 125,000 BTU/Gallon.

6NYCRR 225-2.7

REPORTS, SAMPLING AND ANALYSIS OF WASTE FUELS A AND B

Compliance Certification

Summary of monitoring activities at ST LAWRENCE CEMENT CORP-CATSKILL QUARRY:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
U-06K50	continuous emission monitoring (cem)	111
FACILITY	monitoring of process or control device	42
FACILITY	parameters as surrogate	
U-00K18	record keeping/maintenance procedures	43
U-00K18/00K18	intermittent emission testing	84
U-00F40/-/F04/SEP01	monitoring of process or control device	96
U-00F40/-/F04/SEP02	parameters as surrogate	
U-00F40/-/F04/SEP03	monitoring of process or control device	75
U-00F40/-/F04/SEP04	parameters as surrogate	
U-00F40/00F38/F03/FINML	monitoring of process or control device	76
U-RAWML/-/G04/RAWML	parameters as surrogate	
FACILITY	monitoring of process or control device	77
FACILITY	parameters as surrogate	
U-00K18	record keeping/maintenance procedures	78
FACILITY	record keeping/maintenance procedures	79
FACILITY	record keeping/maintenance procedures	118
U-00K18	monitoring of process or control device	44
FACILITY	parameters as surrogate	
U-00K18	record keeping/maintenance procedures	45
FACILITY	record keeping/maintenance procedures	85
U-00K18	record keeping/maintenance procedures	51
FACILITY	record keeping/maintenance procedures	52
U-00K18	record keeping/maintenance procedures	86
FACILITY	record keeping/maintenance procedures	55
FACILITY	record keeping/maintenance procedures	57
FACILITY	record keeping/maintenance procedures	59
FACILITY	record keeping/maintenance procedures	61
FACILITY	record keeping/maintenance procedures	62
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	27
U-00K18	record keeping/maintenance procedures	30
U-00K18/00K18	record keeping/maintenance procedures	80
U-00K18	monitoring of process or control device	93
FACILITY	parameters as surrogate	
U-00K18	continuous emission monitoring (cem)	81
FACILITY	record keeping/maintenance procedures	35

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FACILITY	record keeping/maintenance procedures	36
FACILITY	record keeping/maintenance procedures	37
U-00K18	work practice involving specific operations	83
FACILITY	continuous emission monitoring (cem)	38
FACILITY	monitoring of process or control device parameters as surrogate	39
U-00K18/00K18	record keeping/maintenance procedures	94
FACILITY	record keeping/maintenance procedures	40
U-00K18/-/K1E/00K18	work practice involving specific operations	87
U-00K18/-/K1E/00K18	work practice involving specific operations	88
U-00K18/-/K1E/00K18	monitoring of process or control device parameters as surrogate	89
U-00K18/-/K1E/00K18	monitoring of process or control device parameters as surrogate	90
U-00K18/-/K1E/00K18	continuous emission monitoring (cem)	91
U-00K18/-/K1E/00K18	record keeping/maintenance procedures	92

Basis for Monitoring

FACILITY SPECIFIC MONITORING

RECORD KEEPING/ MAINTENANCE PROCEDURE

- 36 6NYCRR 220.5
Requires facility to operate in compliance with a dust control plan.
- 37 6NYCRR 220.5(b)
Requires facility to be in compliance with their dust dump when near receptors.
- 38 6NYCRR 220.5(C)
Requires facility to be in compliance with dust dumping in dust dump.
- 41 6NYCRR 225-1.8
Requires facility to maintain records on fuel analysis, quantity of fuel received, and stack test results to ensure compliance with regulation.
- 46 40CFR 63.1349(a)
Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to test methods used to show compliance.
- 52 40CFR 63.1350(a)

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Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to submitting an Operation and maintenance Plan for the facility.

53 40CFR 63.1350(a)

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to submitting an Operation and maintenance Plan for the facility.

56 40CFR 63.1350(j)

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to monitoring opacity per their Operation and maintenance Plan for the facility.

58 40CFR 63.1351(a)

Requires facility to be in compliance with 40CFR 63, Subpart LLL by the required compliance date of June 10, 2002.

60 40CFR 63.1353

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to notification requirements.

62 40CFR 63.1353

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to reporting requirements.

63 40CFR 63.1355

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to records requirements.

86 40CFR 63.1349(b)(3) EU # U-00K18

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to stack testing for D/F emissions from kiln stack.

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87 40CFR 63.1350(f) EU # U-00K18

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to stack D/F emissions from kiln stack by recording the temperature of the exhaust gases.

95 6NYCRR 220.8(a) EU # U-00K18

Requires facility to be in compliance with the requirements for maintaining records on kiln operation.

CONTINUOUS EMISSION MONITORING

39 6NYCRR 220.6(b)

Requires facility to be in compliance with RACT and to properly maintain and operate a continuous emissions monitor for NOx emissions in lbs per ton of clinker.

82 6NYCRR 220.4(a); EU # U-0K18

Requires facility to be in compliance with operating and maintaining a continuous opacity monitor on the kiln stack.

92 6NYCRR 225-2.4 EU # U-00K18

Requires facility to be in compliance with the requirement for continuously monitoring the combustion efficiency of the kiln.

MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

40 6NYCRR 220.6(b)

Requires facility to measure NOx emissions in order to confirm compliance with RACT.

43 40CFR 60.62(c)

Requires facility to be in compliance with a 10% opacity limit on kiln and clinker cooler exhaust.

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44 40CFR 63.1348

Requires facility to be in compliance with 40CFR 63, Subpart A which are the 'General Provisions' of Part 63.

45 40CFR 63.1348, Subpart LLL

Requires facility to be in compliance with 40CFR 63, Subpart LLL in the opacity of emissions which are limited to 10 %.

76, 77, 78, 79 40CFR 63.1347; EU # U-00F40

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to opacity of emissions from mill sweep or air separator, 10% limit.

80 40CFR 63.1347; EU # U-00F40

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to opacity of emissions from mill sweep or air separator, 10% limit.

81 6NYCRR 212.3(a); EU # U-00F40

Requires facility to be in compliance with the requirements for burning tires.

97 40 CFR 63.1343(b)(2) EU # U-00K18

Requires facility to be in compliance with the requirements for opacity limit of 20 % on the kiln..

119 40 CFR 63.1343(b)(2) EU # U-RAWML

Requires facility to be in compliance with the requirements for opacity limit on emissions from raw mill.

WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

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84 6NYCRR 220.0(a) EU # U-00K18

Requires facility to be in compliance with the sulfur dioxide limit on the kiln stack..

88, 89, 90, 91, 93, 6NYCRR 225-2.4 EU # U-00K18

Requires facility to be in compliance with the requirements for sampling waste fuels.

INTERMITTENT EMISSION TESTING

85 40CFR 63.1343(b)(1) EU # U-00K18

Requires facility to be in compliance with 40CFR 63, Subpart LLL in regard to stack testing for particulate emissions from kiln stack.