



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

Facility Identification Data

Name: HOLCIM (US) INC - CATSKILL PLANT

Address: 6446 US RTE 9W

ALSEN, NY 12414

Owner/Firm

Name: HOLCIM (US) INC

Address: 201 JONES RD

WALTHAM, MA 02451, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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Address: ST LAWRENCE CEMENT CO

6446 US RTE 9W PO BOX 31

CATSKILL, NY 12414-0031

Phone:5189434040

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 permit is a renewal to the facility's original title V permit. In this renewal the permit will contain conditions which reflect the recently promulgated Portland Cement NESHAP (40 CFR Part 63, Subpart LLL) which contains limits on mercury, hydrochloric acid, total hydrocarbons, and particulate matter.

This renewal also contains conditions which reflect Best Available Retrofit Technology (BART) and the



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

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

amended NYCRR Part 220 for Portland Cement Manufacturing.

Attainment Status

HOLCIM (US) INC - CATSKILL PLANT 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:

Holcim, Catskill is a Portland Cement and quarry operation located in Catskill, NY. The facility is currently not in operation.

Cement Manufacturing and quarrying of stone have been located at this site since 1912 and the current kiln was constructed in 1964. Holcim operates a cement kiln with a maximum production rate of 2315 tons of clinker/day. The kiln is a long wet kiln which utilizes a slurry feed.

Holcim's quarry provides the majority of the rock used in cement manufacturing. Rock mined at the site is crushed in primary and secondary crushing operations to provide the correct sizing for cement manufacturing.

The cement manufacturing process starts with mixing the raw stone in correct chemical proportions with other additive/corrective materials including calcium, silica, iron, alumina, CKD, bauxite, etc. to obtain an admixture or kiln raw feed that meets the requirements for Portland cement products. Once the stone and additives are proportioned to the raw feed mix, they are slurried into the kiln for pyroprocessing. Some raw materials and fuels can also be added to the mid-kiln area.

Fuels such as coal, pet coke, biomass, fuel oils, chipped and whole tires, waste oils, and natural gas can be used at Holcim Catskill to fire the kiln and to provide constituents essential for cement production.

Pyroprocessing consists of firing the raw feed at high temperatures in the kiln to drive off all water and to create a sustained calcination reaction. Once the limestone is calcined it then reacts with the other additives to form the sintered clinker. Combustion zone air temperatures may reach well over 3000F with kiln feed reaching above 2700F. Clinker from the kiln is then ground with gypsum and other



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

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

additives such as limestone, slag, CKD, etc. Additives are introduced into cement grinding to facilitate production of cement meeting various product specifications (setting time, strengths, etc.)

Holcim Catskill has a number of beneficial use determinations (BUDS) issued by NYSDEC authorizing chipped and whole tires; use of various industrial by-products as additives and correctives; and the use of cement kiln dust (CKD) for various beneficial purposes.

Permit Structure and Description of Operations

The Title V permit for HOLCIM (US) INC - CATSKILL PLANT

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.

HOLCIM (US) INC - CATSKILL PLANT is defined by the following emission unit(s):

Emission unit U1KILN - This unit covers the pyroprocessing in the kiln. Kiln emissions are controlled through good combustion practices, inherent absorption, and exhaust gas treatment in an electrostatic precipitator. This unit exhausts through EP-1KILN. This unit is covered by the NOx RACT Compliance Plan limit of 18 lb NOx/ton of clinker and 1653 lb NOx/hr of operation. The kiln stack is monitored by a NOx CEM system. NOx data is collected continuously and calculated as a 30-day rolling average. The kiln can produce up to 2315 tons/day of clinker and may consume up to 468 mmBtu/hr of heat input.

Emission unit U1KILN is associated with the following emission points (EP):

1KILN

Process: K1A Kiln with electrostatic precipitator burning coal.

Process: K1B Kiln with electrostatic precipitator burning oil.

Process: K1H Kiln with electrostatic precipitator burning coke.

Process: K1I Raw and coal mill operations.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

Process: KC1 Kiln with electrostatic precipitator burning tires. Chipped or whole tires may be used as a substitute fuel and may provide up to 20% of the Btu heat input to the kiln. TDF will not be used during kiln startup and shutdown; usage will be ceased during malfunction.

Process: KF1 Kiln with electrostatic precipitator burning natural gas.

Process: KG1 Kiln with electrostatic precipitator burning non-hazardous fuels and raw materials. See separate permit condition under Part 201-6.5(f) for the protocol that shall be used 1) to evaluate compliance with applicable requirements and 2) to provide notification to NYSDEC.

Emission unit UCKDLF - This unit applies to the CKD landfill. CKD waste are pug milled to create larger chunks of CKD. Placement is done with a limited portion of the fill area active. Any emissions are considered fugitive dust only. Fugitive dust emissions are controlled in several ways. Speed controls are exercised for trucks in this area. The surface crust is cementitious and tight. Water spray or dust suppressants may also be used.

Process: FG2 Disposal of CKD waste in on-site landfill. All CKD waste is pug-milled with water to create CKD cement pellets that are then landfilled.

Emission unit UCLKCL - This unit covers the clinker cooler system. The primary emission point for the unit is the clinker cooler stack, which exhausts to the atmosphere through the clinker cooler baghouse (CLKBG) through emission point EP-CLKCL.

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

CLKCL

Process: C01 Clinker cooler operations.

Emission unit UMATSH - This unit includes all raw, intermediate, and finished materials storage and handling except for storage in piles and bulk storage of liquids in tanks. Emission points include EP-MAT01 through EP-MAT24. This unit includes many transfer points considered CSTPS (covered storage and/or transfer points) that are not emission points and are exempt under the Portland Cement MACT. CSTPS will be included in general building operations for general observation of visible emissions. Emissions through this unit are controlled by a combination of controls including: water sprays, covered conveying, and transfer points (CSTPS), and baghouse dust collectors (DCS).

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

MAT01, MAT02, MAT04, MAT05, MAT06, MAT07, MAT08, MAT09, MAT10, MAT11, MAT12, MAT13, MAT14, MAT15, MAT16, MAT17, MAT18, MAT19, MAT20, MAT21, MAT22, MAT23, MAT24, MAT3A, MAT3B

Process: M01 Coal storage, transfer, loading, and hauling.

Process: M02 Material loading, unloading, transfer, conveying into bins, silos, raw and finish mills. This emission unit includes the permit modification made for the transfer of cementitious materials, such as crancem and portland cement from the dock facility to the loading silos.



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

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

Emission unit UMISCP - This emission unit covers plant roads and materials storage piles. This emission unit covers fugitive emissions. Fugitive sources are included under the plant-wide fugitive dust plan. Dust controls include: road sweeping, water sprayers, speed limitations, an active road paving program, and dust suppressants.

Process: FG1 This unit includes fugitive emissions from plant roads and storage piles.

Emission unit UQUARR - This unit covers all operations including drilling, blasting, loading, and primary and secondary crushing. Emission points include EP-000Q1 and EP-000Q2 for the primary and secondary crushers. Other emissions including those from EP-000Q3 are considered fugitive. Water spray is used in crushing and conveying to prevent dusting. One <150 tons/hr portable crusher is exempt from NSPS Subpart OOO limitations as stated in 40 CFR 60.670(c).

Emission unit UQUARR is associated with the following emission points (EP):
000Q1, 000Q2, 000Q3

Process: Q01 Drilling, blasting, hauling, crushing (primary and secondary), conveying, and loading trucks. This unit includes one portable <150 tons/hr crusher, which is exempt in accordance with Part 201-3.2(c).

Title V/Major Source Status

HOLCIM (US) INC - CATSKILL PLANT is subject to Title V requirements. This determination is based on the following information:

The facility is major for PM, PM-10, SO2, NOx, CO, VOC.

Program Applicability

The following chart summarizes the applicability of HOLCIM (US) INC - CATSKILL PLANT with regards to the principal air pollution regulatory programs:

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

NOTES:

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

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

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

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

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

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

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

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

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

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 4-1926-00021/00040
Renewal Number: 1
12/06/2011

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
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SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code

Description

3-05-007-09	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Primary Crushing
3-05-007-12	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Raw Material Transfer
3-05-007-14	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Clinker Cooler
3-05-007-99	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Other Not Classified
3-05-010-09	MINERAL PRODUCTS COAL MINING, CLEANING & MATL HANDLING (SEE 3-05-310 FOR DIFF UNITS) MINERAL PROD - COAL MINING, CLEANING & MATL HANDL: RAW COAL STORAGE
3-90-002-01	IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE CEMENT KILN/DRYER (BITUMINOUS COAL)
3-90-005-02	IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE Cement Kiln/Dryer
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

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 4-1926-00021/00040
Renewal Number: 1
12/06/2011

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000092-52-4	1, 1 BIPHENYL	> 0	but < 10 tpy
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER	> 0	but < 10 tpy
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN	> 0	but < 10 tpy
0NY504-00-0	40 CFR 63 - TOTAL HYDROCARBONS (THC)	> 0	but < 10 tpy
000075-07-0	ACETALDEHYDE	> 0	but < 10 tpy
000107-02-8	ACROLEIN	> 0	but < 10 tpy
007664-41-7	AMMONIA	> 0	but < 2.5 tpy
007440-36-0	ANTIMONY	> 0	but < 10 tpy
007440-38-2	ARSENIC	> 0	but < 10 tpy
007440-39-3	BARIUM	> 0	but < 2.5 tpy
000071-43-2	BENZENE	> 0	but < 10 tpy
007440-41-7	BERYLLIUM	> 0	but < 10 tpy
007440-43-9	CADMIUM	> 0	but < 10 tpy
000075-15-0	CARBON DISULFIDE	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 250 tpy	but < 75,000 tpy
000108-90-7	CHLOROBENZENE	> 0	but < 10 tpy
007440-47-3	CHROMIUM	> 0	but < 10 tpy
018540-29-9	CHROMIUM (VI)	> 0	but < 10 tpy
007440-48-4	COBALT	> 0	but < 10 tpy
007440-50-8	COPPER	> 0	but < 2.5 tpy
000100-41-4	ETHYLBENZENE	> 0	but < 10 tpy
000050-00-0	FORMALDEHYDE	> 0	but < 10 tpy
0NY100-00-0	HAP	>= 2.5 tpy	but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE	> 0	but < 10 tpy

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

007664-39-3	HYDROGEN FLUORIDE	> 0 but < 10 tpy
007439-92-1	LEAD	> 0 but < 10 tpy
007439-96-5	MANGANESE	> 0 but < 10 tpy
007439-97-6	MERCURY	> 0 but < 10 tpy
000074-82-8	METHANE	> 0 but < 2.5 tpy
000074-83-9	METHYL BROMIDE	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE	>= 2.5 tpy but < 10 tpy
000091-20-3	NAPHTHALENE	> 0 but < 10 tpy
ONY059-28-0	NICKEL (NI 059)	> 0 but < 10 tpy
ONY210-00-0	OXIDES OF NITROGEN	>= 250 tpy but < 75,000 tpy
ONY075-00-0	PARTICULATES	>= 250 tpy but < 75,000 tpy
000108-95-2	PHENOL	> 0 but < 10 tpy
ONY075-00-5	PM-10	>= 250 tpy but < 75,000 tpy
001336-36-3	POLYCHLORINATED BIPHENYL	> 0 but < 10 tpy
007782-49-2	SELENIUM	> 0 but < 10 tpy
007440-22-4	SILVER	> 0 but < 2.5 tpy
000100-42-5	STYRENE	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy but < 75,000 tpy
007440-28-0	THALLIUM	> 0 but < 2.5 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
007440-62-2	VANADIUM	> 0 but < 2.5 tpy
000075-01-4	VINYL CHLORIDE	> 0 but < 10 tpy
ONY998-00-0	VOC	>= 50 tpy but < 100 tpy
001330-20-7	XYLENE, M, O & P MIXT.	> 0 but < 10 tpy
007440-66-6	ZINC	> 0 but < 2.5 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency 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: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

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

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

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

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

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

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
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New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 4-1926-00021/00040
Renewal Number: 1
12/06/2011

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FACILITY	ECL 19-0301	84		Powers and Duties of the Department with respect to air pollution control
U-1KILN/1KILN/KC1	40CFR 52-A.21	77		Prevention of Significant Deterioration
U-1KILN/1KILN/KC1 FACILITY	40CFR 52-A.21(r)	80		Source obligation
	40CFR 63-A.10(e)(3)(i)	47		
FACILITY	40CFR 63-LLL.1342	48		NESHAP for Portland Cement Manufacturing - General Standards
U-1KILN	40CFR 63-LLL.1342	63		NESHAP for Portland Cement Manufacturing - General Standards
U-1KILN/1KILN	40CFR 63-LLL.1343(b)(1)	65, 66, 67, 68, 69, 70, 71, 72, 73		NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills
U-CLKCL/CLKCL	40CFR 63-LLL.1343(b)(1)	82		NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills
U-MATSH	40CFR 63-LLL.1343(b)(1)	83		NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills
FACILITY	40CFR 63-LLL.1345	49		Portland Cement NESHAP - Opacity Standard
FACILITY	40CFR 63-LLL.1346	50, 51		NESHAP for Portland Cement Manufacturing - Standards for new or reconstructed raw material dryers
FACILITY	40CFR 63-LLL.1347	52		NESHAP for Portland Cement Manufacturing - Standards for raw and finish mills
FACILITY	40CFR 63-LLL.1350(f)	53, 54		Monitoring requirements
FACILITY	40CFR 63-LLL.1350(g)	55		Portland Cement NESHAP - D/F Monitoring Requirements
FACILITY	40CFR 63-LLL.1353	56		Notification Requirements
FACILITY	40CFR 63-LLL.1354	57		Reporting Requirements
FACILITY	40CFR 63-LLL.1355	58		Recordkeeping Requirements
FACILITY	40CFR 68	20		Chemical accident prevention provisions
FACILITY	40CFR 82-F	21		Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1		Acceptable ambient air quality.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	85	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 59, 60	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5	23	Standard Permit Requirements
FACILITY	6NYCRR 201-6.5 (a) (4)	15	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	16	Fees
FACILITY	6NYCRR 201-6.5 (c)	3	General conditions
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance schedules
U-1KILN/1KILN/KG1	6NYCRR 201-6.5 (f)	81	Compliance Certification
FACILITY	6NYCRR 201-6.5 (f) (6)	18	Operational flexibility
U-1KILN/1KILN/KC1	6NYCRR 201-7.1	76, 77	Off Permit Changes
FACILITY	6NYCRR 202-1.1	19	Federally Enforceable Emissions Caps
U-1KILN/1KILN/K1A	6NYCRR 202-1.1	74, 75	Required emissions tests.
U-1KILN/1KILN/KC1	6NYCRR 202-1.1	78, 79	Required emissions tests.
FACILITY	6NYCRR 202-1.2	24	Required emissions tests.
FACILITY	6NYCRR 202-1.3 (a)	25	Notification.
FACILITY	6NYCRR 202-2.1	7	Acceptable procedures - reference methods
FACILITY	6NYCRR 202-2.5	8	Emission Statements - Applicability
FACILITY	6NYCRR 211.1	26	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	86, 87	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	86, 87	General Prohibitions - visible emissions limited.

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 4-1926-00021/00040
Renewal Number: 1
12/06/2011

U-1KILN	6NYCRR 212.3 (a)	61	General Process Emission Sources - emissions from existing emission sources
FACILITY	6NYCRR 212.3 (b)	27	General Process Emission Sources - emissions from existing emission sources
U-1KILN	6NYCRR 212.4 (a)	62	General Process Emission Sources - emissions from new sources and/or modifications
FACILITY	6NYCRR 212.4 (c)	28	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6 (a)	29	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
U-1KILN	6NYCRR 220-1.2 (b)	92	Particulate emission limit for large existing kilns and clinker coolers.
U-CLKCL	6NYCRR 220-1.2 (b)	99	Particulate emission limit for large existing kilns and clinker coolers.
FACILITY	6NYCRR 220-1.4 (c)	88	Opacity limits for portland cement processes.
U-CKDLF	6NYCRR 220-1.5 (a)	96	Particulate emissions from dust dumps.
U-CKDLF	6NYCRR 220-1.5 (b)	97	Particulate emissions from dust dumps.
U-CKDLF	6NYCRR 220-1.5 (c)	98	Particulate emissions from dust dumps.
FACILITY	6NYCRR 220-1.6 (a)	89	Sulfur dioxide emissions from kiln stacks.
U-1KILN	6NYCRR 220-1.6 (a)	93	Sulfur dioxide emissions from kiln stacks.
FACILITY	6NYCRR 220-1.6 (b)	90, 91	Emissions of nitrogen oxides from kiln stacks.
U-1KILN	6NYCRR 220-1.7 (a)	94	Kiln and clinker cooler recordkeeping.
U-CLKCL	6NYCRR 220-1.7 (a)	100	Kiln and clinker cooler recordkeeping.
FACILITY	6NYCRR 225-1.2 (a) (2)	30, 31, 32	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.5	33	General Variances Fuel Mixtures.
FACILITY	6NYCRR 225-1.8	34	Reports, sampling and analysis.
FACILITY	6NYCRR 243-1.6 (a)	35	Permit Requirements -



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

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

FACILITY	6NYCRR 243-1.6 (b)	36	CAIR NOx Ozone Season Trading Program Monitoring Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (c)	37	NOx Ozone Season Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (d)	38	Excess Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (e)	39	Recordkeeping and reporting requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-2.1	40	Authorization and responsibilities - CAIR Designated Representative Certificate of representation - CAIR Designated Representative
FACILITY	6NYCRR 243-2.4	41	General Requirements - Monitoring and Reporting
FACILITY	6NYCRR 243-8.1	42, 43	Quarterly reports re: recordkeeping and reporting - Monitoring and Reporting
FACILITY	6NYCRR 243-8.5 (d)	44	Compliance certification re: recordkeeping and reporting - Monitoring and Reporting
FACILITY	6NYCRR 243-8.5 (e)	45	Best Available Retrofit Technology
U-1KILN	6NYCRR 249	95	Deadline for BART Controls and/or Emission Reduction Measures
FACILITY	6NYCRR 249.3 (d)	46	Deadline for BART Controls and/or Emission Reduction Measures
U-1KILN/1KILN	6NYCRR 249.3 (d)	64	Deadline for BART Controls and/or Emission Reduction Measures

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

mitigating measures

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.5 (a) (4)

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

6 NYCRR 201-6.5 (a) (7)

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

6 NYCRR 201-6.5 (a) (8)

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

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 201-6.5 (d) (5)

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

6 NYCRR 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.

6 NYCRR 201-6.5 (f) (6)

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

6 NYCRR 202-1.1

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, HOLCIM (US) INC - CATSKILL PLANT has been determined to be subject to the following regulations:

40 CFR 52.21

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) .

40 CFR 52.21 (r)

Source Obligation:

40 CFR 63.10 (e) (3) (i)



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

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

40 CFR 63.1342

This section provides general emission standards and operating limits for specific sources at Portland Cement Manufacturing Facilities. Table 1 provides a summary.

40 CFR 63.1343 (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.

40 CFR 63.1345

40 CFR 63.1346

40 CFR 63.1347

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

40 CFR 63.1350 (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.

40 CFR 63.1350 (g)

40 CFR 63.1353

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

40 CFR 63.1354

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.

40 CFR 63.1355

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.

6 NYCRR 201-6.5



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

This section of the Title V permitting requirements details the following information: general conditions; permit conditions for monitoring, recordkeeping and reporting of compliance monitoring; compliance certification; operational flexibility; permit shield; term of permits; and reopening for cause.

6 NYCRR 201-6.5 (f)

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

6 NYCRR 201-7.1

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

6 NYCRR 202-1.2

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

6 NYCRR 202-1.3 (a)

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

6 NYCRR 211.1

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

6 NYCRR 212.3 (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.

6 NYCRR 212.3 (b)

6 NYCRR 212.4 (a)

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

6 NYCRR 212.4 (c)



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

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

6 NYCRR 212.6 (a)

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

6 NYCRR 220-1.2 (b)

Particulate emission limit for existing kilns and clinker coolers where process weight per hour is greater than 100,000 lbs.

6 NYCRR 220-1.4 (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.

6 NYCRR 220-1.5 (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.

6 NYCRR 220-1.5 (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.

6 NYCRR 220-1.5 (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.

6 NYCRR 220-1.6 (a)

Fuel with sulfur content exceeding the sulfur limitations required by Subpart 225-1 may be purchased and used in a kiln, provided the burning of such fuel will not result in sulfur dioxide emissions to the outdoor atmosphere at a rate greater than would result through the use of fuels otherwise mandated by Subpart 225-1.

6 NYCRR 220-1.6 (b)



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

A reasonably available control technology (RACT) analysis shall be submitted to the department for emissions of oxides of nitrogen (NO_x) from the kiln that proposes a RACT emission limit(s), and identifies the procedures and monitoring equipment to be used to demonstrate compliance with the proposed RACT emission limit(s). The RACT emissions limit(s) shall be expressed in pounds of NO_x per ton of clinker produced.

6 NYCRR 220-1.7 (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 5 years following acquisition of the data and be available for inspection. Production and feed rates should be summarized monthly.

6 NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6 NYCRR 225-1.5

This regulation allows for the use of a fuel with a sulfur content greater than that allowed on Tables 1, 2 or 3 of 6 NYCRR Part 225-1.2 if the source owner can show that the emissions of sulfur dioxide do not exceed the amount allowed using the equation cited in this regulation.

6 NYCRR 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.

6 NYCRR 243-1.6 (a)

This condition requires the facility to acknowledge that they are subject to this CAIR regulation and provide owner and contact information. It also requires them to update this information as it changes or provide supplemental information at the Departments request.

6 NYCRR 243-1.6 (b)

This condition obligates the owners and operators of the facility to comply with the monitoring and reporting requirements of the CAIR regulations.

6 NYCRR 243-1.6 (c)

This citation explains the general provisions of the Clean Air Interstate Rule (CAIR) NO_x Ozone Season

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



Permit ID: 4-1926-00021/00040

Renewal Number: 1

12/06/2011

Trading Program. This ozone season NOx cap and trade program runs from May 1 through September 30 each year, starting in 2009. Each source shall hold a tonnage equivalent in CAIR NOx Ozone Season allowances that is not less than the total tons of NOx emissions for the ozone season.

6 NYCRR 243-1.6 (d)

This citation for the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains some of the penalties that can be imposed on a CAIR NOx Ozone Season source that does not surrender enough CAIR NOx Ozone Season allowances to cover their NOx Ozone Season emissions.

6 NYCRR 243-1.6 (e)

This citation for the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program requires that all reports be submitted as required by this program, and that copies of all records and submissions made for this program be kept on site for at least five years.

6 NYCRR 243-2.1

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains that an CAIR NOx Ozone Season designated representative must be selected to submit, sign and certify each submission on behalf of the source for the this program.

6 NYCRR 243-2.4

This condition describes the required elements of the "Certificate of Representation" for the CAIR program and the certifying language required with submissions to the Department.

6 NYCRR 243-8.1

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains that CAIR NOx Ozone Season Trading Program sources must install, certify and operate monitoring systems the meet the monitoring, recordkeeping, and reporting requirements in Subpart 6 NYCRR 243-8 and in Subpart H of 40 CFR Part 75.

6 NYCRR 243-8.5 (d)

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains what requirements the quarterly reports must meet.

6 NYCRR 243-8.5 (e)

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains the compliance certification requirements the source must follow for each quarterly report.

6 NYCRR 249.3 (d)

6 NYCRR Part 249

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 4-1926-00021/00040
Renewal Number: 1
12/06/2011

Compliance Certification
Summary of monitoring activities at HOLCIM (US) INC - CATSKILL PLANT:

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

U-1KILN/1KILN/KC1	80	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
U-1KILN/1KILN	65	intermittent emission testing
U-1KILN/1KILN	66	continuous emission monitoring (cem)
U-1KILN/1KILN	67	continuous emission monitoring (cem)
U-1KILN/1KILN	68	continuous emission monitoring (cem)
U-1KILN/1KILN	69	continuous emission monitoring (cem)
U-1KILN/1KILN	70	continuous emission monitoring (cem)
U-1KILN/1KILN	71	continuous emission monitoring (cem)
U-1KILN/1KILN	72	continuous emission monitoring (cem)
U-1KILN/1KILN	73	continuous emission monitoring (cem)
U-CLKCL/CLKCL	82	continuous emission monitoring (cem)
U-MATSH	83	monitoring of process or control device parameters as surrogate
FACILITY	49	monitoring of process or control device parameters as surrogate
FACILITY	50	monitoring of process or control device parameters as surrogate
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	monitoring of process or control device parameters as surrogate
FACILITY	54	monitoring of process or control device parameters as surrogate
FACILITY	55	intermittent emission testing
FACILITY	23	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
U-1KILN/1KILN/KG1	81	record keeping/maintenance procedures
U-1KILN/1KILN/KC1	77	continuous emission monitoring (cem)
U-1KILN/1KILN/K1A	74	record keeping/maintenance procedures
U-1KILN/1KILN/K1A	75	record keeping/maintenance procedures
U-1KILN/1KILN/KC1	78	record keeping/maintenance procedures
U-1KILN/1KILN/KC1	79	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	87	record keeping/maintenance procedures
FACILITY	27	monitoring of process or control device parameters as surrogate
U-1KILN	62	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	record keeping/maintenance procedures
U-1KILN	92	intermittent emission testing
U-CLKCL	99	intermittent emission testing
FACILITY	88	record keeping/maintenance procedures
FACILITY	89	work practice involving specific operations
U-1KILN	93	record keeping/maintenance procedures
FACILITY	90	continuous emission monitoring (cem)
FACILITY	91	continuous emission monitoring (cem)



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U-1KILN	94	record keeping/maintenance procedures
U-CLKCL	100	record keeping/maintenance procedures
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	monitoring of process or control device parameters as surrogate
FACILITY	33	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
U-1KILN	95	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
U-1KILN/1KILN	64	record keeping/maintenance procedures

Basis for Monitoring

Monitoring conditions in this permit modification are of 5 types:

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

The carbon monoxide 99 ton/yr cap CEMS monitoring, Part 204 and Part 220 RACT NOx monitoring, and the kiln and clinker cooler opacity monitoring are this type of monitoring

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

The pre and post TDF stack testing, 5 year kiln and clinker cooler particulate testing, 2.5 year kiln dioxin/furan testing are this type of monitoring. The 5 year 3 hour Method 9 observations of all emission points, the daily 6 minute Method 22 observations of the mills and the monthly 1 minute Method 22 observations of the material handling emission points are this type of monitoring.

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

The continuous monitoring of the kiln back end temperature is this type of monitoring.

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

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

5. Permit conditions with “record keeping/maintenance procedures”: this type of monitoring refers to activities involving the upkeep of records to demonstrate compliance with a requirement or the application of maintenance procedures which may be necessary to maintain acceptable operations.

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