

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4154-00002/01743 Modification Number: 3



02/17/2005

Facility Identification Data

Name: GE SILICONES WATERFORD FACILITY
Address: 260 HUDSON RIVER RD
WATERFORD, NY 12188

Owner/Firm

Name: GE SILICONES LLC
Address: 260 HUDSON RIVER RD
WATERFORD, NY 12188, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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WATERFORD, NY 12188
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Permit Description

Introduction

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

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Summary Description of Proposed Project

This modification is for two changes at this facility:

1) Fines Reuse Process - A fines reuse process (process ID FRP) has been developed which will feed fines back into the process in order to recover more silicon, thereby increasing MCS conversion and reducing byproduct volume and reactivity. One reactor (MCS-3) will be modified to further react MCS fines to consume more of the remaining silicon. Because the fines resulting from this reuse process will have a smaller average particle size than the fines currently handled, additional particulate control is planned.

2_ TCS Capacity Increase - Trichlorosilane (TCS) is produced in Process ID "TCS" b reacting silicon powder with hydrochloric acid. GES is planning to produce more TCS, rather than purchase it, to satisfy market demand. This will be accomplished by running the TCS reactor at the same rate but more hours per year. A new distillation column will be needed to purify the additional TCS. The current Residue Column in the MCS area (TSW 620171) will be removed and the new column will be put in its place. The Residue Column Source ID "IB358" will be reused for the new column. The vent from this new column will tie into the WWTP incinerator vent header (Emission Unit C-27018). The emissions will be identical to those of the residue column so no new estimates are provided. These emissions are very small compared to the total chloride and silica loading to the WWTP incinerators.

Attainment Status

GE SILICONES WATERFORD FACILITY is located in the town of WATERFORD in the county of SARATOGA.

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.)

Table with 2 columns: Criteria Pollutant, Attainment Status. Rows include Particulate Matter (PM), Particulate Matter < 10µ in diameter (PM10), Sulfur Dioxide (SO2), Ozone*, Oxides of Nitrogen (NOx)**, and Carbon Monoxide (CO).

* 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

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Facility Description

General Electric operates a silicone production facility (sic 2821) located in Saratoga county, New York, in the town of Waterford. The plant is approximately 12 miles north of Albany. The site produces silicone products and other materials including resins, fluids, dispersions, emulsions, heat curing elastomers, room temperature vulcanizing (rtv) elastomers and fumed silica. The site has continuous and batch chemicals processes, compounding, finishing and packaging operations, and steam generation capability.

Major emissions include: Carbon Monoxide (CO), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), Oxides of Nitrogen (NO_x), Particulate Mater (PM) and Particulate Mater less than 10 microns (PM-10).

Emission unit listing and a brief description:

C-23002: This unit consists of emissions from tanks in the Building 23 Tank Farm area. The building 23 tank farm system consists of storage tanks and a scrubber for control. The unit provides storage for the products made in the Methylchlorosilane (MCS) area. The regulations that apply to this unit are 6 NYCRR Part 212 State Air Toxics.

C-27018: This unit consists of the following production areas: Methyl Chloride, Gaseous Dihydrolysis (GDH), Liquid Dihydrolysis (LDH), Siloxane Oil, and the Area 38 tank farm. The unit also includes the following control devices and their associated equipment: the MCS Vent Incinerator, MCS Vent Scrubber, the Fixed Box (#2) Hazardous Waste Incinerator, and the Rotary Kiln Hazardous Waste Incinerator. Sources in this unit include storage tanks, distillation columns, process vessels, Synthetic Organic Chemical Manufacturing Industry (SOCMI) distillation columns, SOCMI reactors, and SOCMI wastewater. Applicable regulations for unit C-27018 include: the Hazardous Organic NESHAP (HON) under 40 CFR 63 Subparts F, G, and H, the Hazardous Waste Incinerator MACT under 40 CFR 63 Subpart EEE, New Source Performance Standards (NSPS) for SOCMI distillation columns (40 CFR 60 Subpart NNN), SOCMI reactors (40 CFR 60 Subpart RRR), and volatile organic liquid (VOL) storage tanks (40 CFR 60 Subpart Kb), Volatile Organic Compound Reasonably Available Control Technology (VOC RACT) under 6 NYCRR Subpart 212, sulfur fuel limitations under 6 NYCRR Subpart 225, VOC RACT for storage tanks under 6 NYCRR Subpart 229, and State Air Toxics under 6 NYCRR Subpart 212. The permit includes an alternative operating scenario for installation of a new redistribution reactor.

C-27035: Emission unit C-27035 is comprised of several aboveground storage tanks that are used to store acids. All of the tanks are located in the HCL Tank Farm. All but one of the tanks vents to a packed tower water scrubber (EP27035). One tank vents to an eductor (EP27039) which is piped to the chemical process sewer. The emission unit also contains three locations within the tank farm, which allow for scrapping of acid to the chemical process sewer. The applicable regulations are State Air Toxics under 6 NYCRR Subpart 212 and New Source Performance Standards (NSPS) for volatile organic liquid (VOL) storage tanks under 40 CFR 60 Subpart Kb.

C-61007: Emission unit C-61007 includes the Silicon Grinding and Fines Passivation area. In the area,

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Silicon Grinding area, silicon metal is ground, screened, and transferred to silos. In the Fines Passivation area, mixers are used to mix fines to neutralize and harden the material. Processes include mixers, dust collectors, and an unloading station. Applicable regulations for this unit include emissions limitations for capping under Prevention of Significant Deterioration (40 CFR Subpart 52), and particulate emissions limitations under 6 NYCRR 212.

C-62008: Emission unit C-62008 includes all equipment associated with the methylchlorosilane (MCS) reactor systems (MCS II system, MCS III system and MCS IV system) that are not associated with the control devices in unit C-27018. Sources include process vessels, feed hoppers, and hot oil furnaces. Applicable regulations for this unit include emissions limitations for capping under Prevention of Significant Deterioration (40 CFR Subpart 52) and Non-Attainment New Source Review under 6 NYCRR 231-2, and particulate limitations under 6 NYCRR 212.

C-62014: This unit consists of sources in the Trichlorosilanes (TCS) and Fumed Silica production areas. The TCS area currently consists of exempt sources. The Fumed Silica area consists of a scrubber and various solids handling equipment. Applicable regulations include State Air Toxics under 6 NYCRR Subpart 212.

F-INISH: This unit consists of intermediate and final production of silicone products and materials, including resins, fluids, dispersions, emulsions, heat curing elastomers, room temperature vulcanizing (rtv) elastomers, sealants, and treated fumed silica. Also includes various maintenance shops and individual maintenance sources (such as degreasers). Process sources include storage vessels, batch reactors, process tanks, mixers, feed hoppers, filter presses, drumming operations, liquid add stations, process strippers, unloading stations, packaging operations, maintenance degreasers, and all of the associated control equipment. Applicable regulations include the following: emissions limitations for capping under Prevention of Significant Deterioration (40 CFR Subpart 52) and Non-Attainment New Source Review under 6 NYCRR 231-2, New Source Performance Standards (NSPS) for volatile organic liquid (VOL) storage tanks under 40 CFR 60 Subpart Kb, Volatile Organic Compound Reasonably Available Control Technology (VOC RACT) under 6 NYCRR Subpart 212, State Air Toxics under 6 NYCRR Subpart 212, VOC RACT for Storage Tanks Under 6 NYCRR 229, and VOC RACT for Part Cleaners under 6 NYCRR 226.

T-13004: Unit 13004 consists of various pilot plant processes located in Building 13. Sources include process vessels, filters, and local extraction discharges. The applicable regulations include State Air Toxics under 6 NYCRR Subpart 212.

T-14009: This unit consists of equipment in the facility's Pilot Plant, located in Buildings 14, 15 and 16. The Pilot Plant makes developmental/experimental products for evaluation, and scaled-down batches of problem production grades to develop process adjustments. Scaled down batches of commercial products are also made here. Processes are small-volume sources including process vessels, strippers, distillation columns, mixers, and reactors. The applicable regulations include State Air Toxics under 6 NYCRR Subpart 212.

U-28002: Emission Unit U28002 consists of Boilers 13 and 18 and a #2 Fuel Oil storage tank. Applicable regulations include emissions limitations for capping under Prevention of Significant Deterioration (40 CFR Subpart 52) and Non-Attainment New Source Review under 6 NYCRR 231-2,



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New Source Performance Standards (NSPS) for volatile organic liquid (VOL) storage tanks under 40 CFR 60 Subpart Kb, NSPS regulations for industrial boilers under 40 CFR 60 Subpart Db, NOx RACT under 6 NYCRR 227-2, particulate limitations under 6 NYCRR 227-1, NOx Budget regulations under 6 NYCRR 227-3 and 204, and fuel limitations for sulfur under 6 NYCRR 225. The permit includes an alternative operating scenario for installation of a heat exchanger.

U-28003: Emission Unit U28003 consists of boilers 14, 15, 16, and 17. Applicable regulations include Prevention of Significant Deterioration (40 CFR Subpart 52) and Non-Attainment New Source Review under 6 NYCRR 231-2, NOx RACT under 6 NYCRR 227-2, particulate limitations under 6 NYCRR 227-1, and fuel limitations for sulfur under 6 NYCRR 225.

W-97004: This emission unit is the wastewater treatment process system of the waste handling area. The wastewater treatment plant is a physical/chemical treatment system consisting of pH neutralization, oil and grease separation, clarification, and air stripping operations. The applicable regulations are New Source Performance Standards (NSPS) for Volatile Organic Liquid (VOL) storage tanks under 40 CFR 60 Subpart Kb, State Air Toxics under 6 NYCRR Subpart 212, and Volatile Organic Compound Reasonably Available Control Technology (VOC RACT) under 6 NYCRR Subpart 212.

Permit Structure and Description of Operations

The Title V permit for GE SILICONES WATERFORD FACILITY 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.

GE SILICONES WATERFORD FACILITY is defined by the following emission unit(s):
Emission unit C27018 - Chemical operations - Methyl Chloride operation area (Methanol recovery

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columns and storage tanks, sulfuric scrubber and storage tanks, ldh/siloxanes oil production, methyl chloride, area 38 tank farm, and methyl chloride condensers and storage tanks). The MCS vent incinerator, MCS vent scrubber, fixed box incinerator no. 2, and the rotary kiln incinerator are also included in this unit.

Emission unit C27018 is associated with the following emission points (EP):

21011, 27018, 27021, 27022, 27023, 27024, 27025, 27032, 34001, 34002, 35006, 35007, 35009, 35010, 35011, 35012, 35017, 35018, 35031, 35901, 38006, 38007, 38018, 57002, 57003, 62005, 62007, 62011, 70001, 70003, 97001, 97002, 97003, 97013

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

Process: AYA is located at Building 21 - LDH/Siloxane oil production. Insignificant emissions from the 107/108 column.

Process: CMP is located at Building 27 - HCl compressor and GDH start up. This process represents Hydrogen Chloride fume scrubber for GDH start ups.

Process: CNAZnCl solution tank. Insignificant emissions from the ZnCl solution tank due to breathing losses.

Process: CNBZnCl solution tank. Insignificant emissions from the ZnCl solution tank due to working losses.

Process: COA526 Tank. Insignificant emissions from the 526 Tank due to breathing losses.

Process: COB526 Tank. Insignificant emissions from the 526 Tank due to working losses.

Process: CSDChlorosilane distillation. This process consists of distillation columns in the Chlorosilane distillation area which vent to the MCS vent scrubber.

Process: EBALDH/Siloxane oil production. Insignificant emissions from a tank used to collect Silicone oil from an oil/water separator which is pumped out when full.

Process: EBCLDH/Siloxane oil production. Insignificant emissions from the D Cracker hot well which receives Nitrogen and condensed steam and cyclic Siloxanes from the D Cracker ejector system.

Process: ECALDH/Siloxane oil production. Insignificant emissions from the Cracker preheaters drain tank which receives water and Cyclic Siloxanes from preheaters on Crackers B C and D.

Process: ECBLDH/Siloxane oil production. Insignificant emissions from the D Cracker reactor vent.

Process: ECCLDH/Siloxane oil production: Insignificant emissions from the C Cracker reactor vent.

Process: EQL is located at Building 34 - Equipment leaks. This process represents closed vent system, compressor, connector, pressure relief valve, pump, sampling connection, vessel and receiver, and valve leaks for the Methyl Chloride chemical manufacturing process unit.

Process: FGBTank farm. Insignificant emissions from Siloxane storage tank 007. Tank has a continuous Nitrogen purge.

Process: FGCTank farm. Insignificant emissions from Siloxane storage tank 008. Tank has a continuous Nitrogen purge.

Process: FHATank farm. Insignificant emissions from 30,000 gallon storage tank 539. Tank has a continuous Nitrogen purge.

Process: FRP is located at 1st floor, Building 62 - The Fines Reuse Process will feed silicon fines to the MCS-3 reactor for further reaction. Resulting vents containing silicon powder will be routed to a venturi scrubber (GF1C3) and a wet cyclone (GF1C4) before going to a venturi/packed scrubber pair.

Process: FSBBreathing losses from storage tank.

Process: FSWorking losses from storage tank.

Process: GRASStorage tanks. Insignificant emissions from working losses from Siloxane hydrolyzate storage tank.

Process: GRBInsignificant emissions from standing storage losses from Siloxane hydrolyzate storage

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tanks.

Process: GRC Insignificant emissions from working losses from Siloxane hydrolyzate storage tank.

Process: GRD Insignificant emissions from standing storage losses from Siloxane hydrolyzate storage tank.

Process: HWW Heat exchange system. This process represents cooling water from heat exchange systems within the Methyl Chloride chemical manufacturing process unit.

Process: INC Waste treatment incinerators. This process consists of the Rotary Kiln Incinerator and the Fixed Box Incinerator no. 2 in the waste treatment plant.

Process: LBD Low boiling distillation and redistribution. This process consists of multiple distillation columns and two reactors in the low boiling distillation and redistribution area which vent to the waste incinerators or the MCS vent scrubber.

Process: LDH is located at Building 35 - LDH/Siloxanes oil production. This process represents distillation columns, crackers, Siloxane water removal systems, and neutralizer vents associated with LDH and Siloxanes oil production.

Process: MCR MCS IV reactor purge. This process consists of a purge on a reactor vessel.

Process: MCS MCS to incinerators/scrubbers. This process consists of sources in the Methyl Chlorosilane operations area which vent to the waste incinerators, the MCS vent incinerator, or the MCS vent scrubber.

Process: MIV MCS IV Methyl Chloride recovery column. This process consists of the MCS IV Methyl Chloride recovery column which vents to the MCS vent incinerator or the waste incinerator.

Process: MRC is located at Building 34 - Methanol recovery columns. Dual distillation columns which recover Methanol from water scrubber bottom product.

Process: MST is located at Building 27 - Methanol storage tanks. Two storage tanks that supply Methanol to the Methyl Chloride reactors in building 34. Both tanks are equipped with an internal floating roof.

Process: MTCC Column 114 B Mono/Tri column. This process consists of the 114 B distillation column which vents to the waste incinerators or to the MCS vent scrubber on startup.

Process: MWW is located at Building 34 - Maintenance wastewater. This process represents maintenance wastewater from the Methyl Chloride chemical manufacturing process unit.

Process: PWW is located at Building 34 - Process wastewater. This process represents process wastewater from the Methyl Chloride chemical manufacturing process unit.

Process: SFHM MCS IV Silicon feed hoppers. This process consists of two fresh Silicon feed hoppers in the MCS IV operational area.

Process: SST is located at Building 27 - Water scrubber, spent sulfuric storage tank and loading. Sulfuric acid fumes are vented from the head space of the spent sulfuric acid tank.

Process: TBA Tributylamine tank 014 502. This process consists of the working losses from Tributylamine storage tank 014 502.

Process: TCSTCS/FS to incinerators or scrubbers. This process consists of sources in the Tri-Chlorosilane and fumed Silica operating areas which vent to the waste incinerators or the MCS vent scrubbers.

Process: TDID Dimethyldichlorosilane tanks 001A, 002A. This process consists of two Dimethyldichlorosilane tanks which vent to the MCS vent scrubber due to working losses.

Process: TNK Storage tanks - working losses. This process consists of working losses from storage tanks which vent to the MCS vent scrubber or the waste incinerators.

Process: TNV This process consists of redistribution tanks which vent when filled (working losses) to the waste incinerators as an alternate and equivalent means of control.

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Process: TR2Residue storage tank 599A. This process consists of the working losses from residue storage tank 599A.

Process: TRCResidue cleavage tank 004A. This process consists of working losses from residue cleavage tank 004A.

Process: TRDRedistribution tankage. This process consists of working losses from two tanks utilized in redistribution.

Process: TVSThis process consists of slurry and Silane tanks which vent when filled (working losses) to the waste incinerators as an alternate and equivalent means of control.

Process: WES117/118 column system. Emissions from the 117/118 columns are transferred to the 547B knockout tank, where condensed vapors are collected. The remaining vapors are sent to an eductor water unit, where the gases are mixed with tempered water and are sent to the chemical sewer.

Process: WTSWaste treatment air strippers. This process consists of the waste treatment plant air strippers.

Emission unit FINISH - Finishing - intermediate and final production of silicone products and materials including resins, fluids, dispersions, emulsions, heat curing elastomers, room temperature vulcanizing (rtv) elastomers, sealants, and treated fumed silica. Also includes various maintenance shops and individual maintenance sources (such as degreasers).

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

21101, 23005, 23100, 23101, 24102, 24103, 24104, 24105, 24107, 24108, 24109, 24110, 24111, 24120, 24121, 24125, 24127, 24132, 24133, 24134, 24135, 24136, 24141, 24201, 24202, 24205, 24207, 24208, 24209, 24210, 24211, 24301, 24302, 24305, 24307, 24308, 24309, 24310, 24311, 24312, 24401, 24402, 24404, 24405, 24407, 24409, 24411, 24412, 24413, 24414, 24423, 24702, 24703, 24704, 24801, 24806, 24906, 24907, 24908, 24909, 24910, 24916, 24922, 24924, 24925, 24927, 24928, 24932, 24933, 24934, 24935, 24936, 24937, 24938, 24939, 24940, 24944, 24945, 24946, 24947, 24948, 27102, 28009, 29102, 30001, 30002, 30801, 30802, 30803, 30804, 30805, 30806, 30807, 30808, 30901, 30902, 30904, 30905, 30907, 30910, 30911, 30912, 30913, 30914, 30915, 30916, 30917, 30918, 30921, 30922, 30932, 30933, 30935, 30937, 30938, 30939, 30945, 30946, 31003, 31017, 31019, 31022, 31030, 31031, 31032, 31034, 31035, 31036, 31037, 31038, 31040, 31041, 32006, 32007, 32008, 32009, 32016, 32017, 32026, 32027, 32028, 32029, 32030, 32033, 32035, 32036, 32038, 32040, 32042, 32044, 32046, 32049, 32050, 33002, 33003, 33004, 33017, 33019, 33020, 33024, 33901, 33902, 33903, 33904, 33905, 33906, 36001, 37001, 37002, 37003, 37004, 37005, 37007, 37009, 37011, 37012, 37013, 37014, 37016, 37017, 37018, 37019, 37020, 37021, 37022, 37023, 37027, 37032, 37033, 37034, 37036, 37040, 37041, 37042, 37044, 37045, 37047, 37048, 37049, 37050, 37051, 37054, 37055, 37056, 37059, 37060, 37061, 37066, 37067, 37068, 37069, 37070, 37071, 37074, 37075, 37077, 37701, 37702, 37704, 37705, 37707, 37708, 37801, 37803, 37804, 37805, 37806, 37812, 37813, 37814, 37815, 37816, 37817, 37818, 37819, 37901, 37902, 37903, 37905, 37907, 37909, 37910, 37911, 37917, 37918, 37919, 37920, 37921, 37922, 37924, 37925, 37929, 37932, 37934, 37935, 37936, 37937, 37938, 37939, 37940, 37941, 37942, 37943, 37944, 37945, 37946, 37947, 37948, 37949, 37950, 37951, 38008, 41001, 41002, 41003, 42001, 42002, 42003, 42005, 42012, 42019, 42020, 48001, 61602, 61603, 70006, 71001, 71003, 71005, 71009, 71010, 71011, 71013, 71014, 71016, 71710, 76001, 76004, 76005, 76006, 76007, 76009, 76012, 76013, 76014, 76701, 76703, 76705, 76710, 76711, 76716, 78001, 78002, 78003, 78004, 78005, 78006, 78007, 78008, 78009, 78011, 78012, 78015, 78016, 78017, 78018, 78019, 78021, 78022, 78023, 78024, 78025, 85001, 85002, 85004, 85005, 85006, 85008, 85009, 85013, 85015, 85020, 85021, 85022, 85023, 85024, 85025, 85036, 85037, 85038, 85039,

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85040, 85041, 85042, 85043, 85044, 85054, 85058, 85059, 85066, 85901, 85902, 85903, 85904, 97023

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

Process: 1FS1M Fluorosilicone reactor. A 1000 gallon batch system used to manufacture Fluorosilicone Polysiloxane. The process consists of two steps: production of 88536 followed by hydrolysis. Major equipment includes a reactor, weigh tank, and two receivers.

Process: 1ME1M hydrolyzer eductor. The 1M hydrolyzer vents to an eductor scrubber which eventually flows to the chemical sewer.

Process: 1MH1M hydrolyzer. A 1000 gallon multifunctional batch system used to manufacture various product grades. The hydrolyzer is used for hydrolysis reactions. Associated equipment includes weigh tanks, drum/tanker charges, and filters and a vacuum pump.

Process: 1MR1M reactor. A 1000 gallon batch system used to manufacture various specialty products. Associated equipment includes weigh tanks, drum/tanker charges, filters.

Process: 1MV1M reactor. Local ventilation system used to remove Dimethylformamide vapors during filter rebuild.

Process: 2MD2M Dispersions - A batch process for the production of pressure-sensitive adhesives. Resin, Phenyl and Methyl gums, and catalysts are mixed and reacted. Water is refluxed out of the batch. Major equipment includes a kettle, receivers, and condensers.

Process: 2MH2000 hydrolyzer system. A batch system that produces Silicone fluids and occasionally used as a back-up for the 3000 FAK system.

Process: 30DWP1/WP4 Extruders Solids handling operations vent to two dust collectors in parallel. Associated equipment includes WP mixer funnels, WP mixers, filler densifier, bag and drum dump stations, and feeders.

Process: 3MH3M hydrolyzer. A 3000 gallon multifunctional batch system used to manufacture various product grades. The hydrolyzer is used for hydrolysis reactions, cold mixes, and equilibrium processes. Associated equipment includes weigh tanks, drum/tanker charging, filters.

Process: 4MD4M Dispersions - Used for batch and continuous processes. The batch processes make paper-release and pressure-sensitive adhesives products. The continuous process performs crackbacks on transition material. Major equipment includes a kettle, receivers, and condensers.

Process: 4MTT Tank Working Losses - Working losses from a naphtha storage tank. The tank is equipped with a 5 psig pressure relief valve and a pad/depad system.

Process: 5PR1500 Phenyl reactor (Diol and Tetramer). A batch system used to manufacture phenyl diol and Pheny Tetramer.

Process: APSAPS tank in bldg.37. This process consists of working losses from the APS tank in bldg. 37.

Process: ASD Artisan stripper dust collector. Dust collection system for solids grinding operation.

Process: AST Artisan stripper process tanks. This process consists of the feed (process) tanks servicing the Artisan stripper.

Process: BBMRubber Mixers - Banbury Mixers used to produce silicone rubber compounds. The mixers are batch mixers.

Process: BDC Bag dump dust collector. This process consists of a dust collector utilized when loading solid materials in a charging hopper.

Process: BE1 South resins. During the vacuum process, emissions from a body kettle condenser pass through a receiver to a vacuum eductor and out to the atmosphere.

Process: BE2 East resins. During the vacuum process, emissions from a body kettle condenser pass through a receiver to a vacuum eductor and out to the atmosphere.

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Process: BEATransfer and Blending. Insignificant emissions from working losses of acetone storage tank.

Process: BEBTransfer and Blending. Insignificant emissions from standing storage losses of Acetone storage tank.

Process: BFVRubber Mixers Solids handling operations associated with the Rubber Mixer Area. Associated equipment includes filler vents, filler use bins, and silos.

Process: BHAMQ Resing. Insignificant emissions from a closed stirred kettle used as a charge tank for various organic solvents and water.

Process: BJAMQ Resins. Insignificant emissions from a screen cleaning bath.

Process: BJMQ resins. Insignificant emissions from a polar solvent stripper (PSS) receiver.

Process: BKAArtesian stripper. Insignificant emissions from solvent recovery tank.

Process: BM1Batch Mixing The 225 gallon Day Mixer, the 500 gallon Day Mixer, and the 500 gallon B-K mixer vent to the atmosphere. The mixers are used to mix Silicone.

Process: BM2Batch Mixing The 225 gallon Day Mixer, the 500 Day Mixer, and the 500 gallon B-K Mixer vent through a common vacuum pump. The mixers are used to mix silicone.

Process: BM3Batch Mixing The 225 gallon Day Mixer, the 500 gallon Day Mixer, and the 500 gallon B-K Mixer vent to a dust collector. The mixers are used to mix Silicone.

Process: BM4Batch Mixing The 225 gallon Day Mixer, the 500 gallon Day Mixer, and the 500 gallon B-K Mixer vent to a dust collector.

Process: BMABatch Mixing The 630 liter, the 3000 liter north, and the 3000 liter south Drais Mixers, add stations vent through elephant trunks.

Process: BMDMolding Compound Area Solids handling operations, including dust collectors for grinding operations and exhaust hoods, blending and extruding, and bag slitting. Associated equipment includes mixers, extruders, grinders, and blenders.

Process: BMKBatch Mixing the 3000 liter north Drais Mixer knock-out pot vents through an elephant trunk.

Process: BMPBatch Mixing Various solids handling operations vent to a dust collector. Operations include bag dumping stations, dust hoods, and pallet loading.

Process: BMTBatch Mixing Vents from two 450 gallon square totes for Building 30 RTV batch mixing.

Process: BNASouth resins. Insignificant emissions from weigh tank for various Chlorosilanes.

Process: BNBSouth resins. Insignificant emissions from hydrolyzer condenser vent from process kettle.

Process: BNCSouth resins. Insignificant emissions from a wash tank.

Process: BNDSouth resins. Under atmospheric conditions, emissions from a body kettle condenser. Emissions from the kettle can also go to a receiver vent.

Process: BNFSouth resins. Insignificant emissions from a filter aid kettle vent.

Process: BOASouth resins. Insignificant emissions from a closed, stirred kettle used to make up a precoating slurry for the product filters.

Process: BOBSouth resins. Insignificant emissions from a blending kettle vessel vent.

Process: BQAEast resins. Insignificant emissions from a weigh tank used for various Chlorosilanes.

Process: BQBEast resins. Insignificant emissions from a hydrolyzer condenser vent.

Process: BQCEast resins. Insignificant emissions from a stirred process kettle for resins and polymers.

Process: BQDEast resins. Under atmospheric conditions, emissions from a body kettle condenser vent. Emissions from the kettle can also go to a receiver vent.

Process: BQFEast resins. Insignificant emissions from closed, agitated filter aid kettle.

Process: BRAEast resins. Insignificant emissions from a closed, stirred kettle used to make up a precoating slurry for the product filters

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Process: BRBEast resins. Insignificant emissions from a weigh tank for various Chlorosilanes..

Process: BRVPoly kettles. A mechanical vacuum system connected to a batch reactor.

Process: BTAWest resins. Insignificant emissions from weigh tank for various Chlorosilanes.

Process: BTBWest resins. Insignificant emissions from hydrolyzer condenser vent.

Process: BTCWest resins. Insignificant emissions from a closed, stirred kettle used as a charge tank.

Process: BTDWest resins. Insignificant emissions from a body kettle condenser vent.

Process: BTEWest resins. Insignificant emissions from the west wash tank.

Process: BUAContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the west body kettle.

Process: BUBContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the east body kettle.

Process: BUCContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the west batch hydrolyzer interface tank.

Process: BUDContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the south wash tank.

Process: BUEContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the #1 neutralizer.

Process: BUFContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the #2 neutralizer.

Process: BUGContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the #3 neutralizer.

Process: BUHContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the premix tank.

Process: BUIContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the blend tank.

Process: BUJContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the south body kettle.

Process: BUKContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the west hydrolyzer.

Process: BULContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the east hydrolyzer.

Process: BUMContinuous hydrolyzer. Insignificant emissions from the sampling and maintenance of the east wash tank.

Process: BUNSouth resins. Insignificant emissions from a blend kettle.

Process: BUOSouth Resins - Insignificant emissions from a weigh tank for various Chlorosilanes.

Process: BVAContinuous hydrolyzer. Insignificant emissions from continuous hydrolyzer interface tank 76-329 used for solution separation.

Process: BVSRubber Mixers Vacuum cleaning systems associated with the Rubber MIxer area.

Process: BYAEquilibrators, NV still, #8, #9, #10 FAKS. Insignificant emissions resulting from filter cleaning and maintenance.

Process: BYBEquilibrators, NV Still, #8, #9, #10 FAKS. Insignificant emissions from the precoat tank during sampling.

Process: BYCEquilibrators, NV Still, #8, #9, #10 FAKS. Insignificant emissions from sampling the NV still.

Process: BYDEquilibrators, NV Still, #8, #9, #10 FAKS. Insignificant emissions from sampling the #1 FAK.

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Process: BYEEquilibrators, NV still, #8, #9, #10 FAKs. Insignificant emissions from sampling the west batch neutralizer.

Process: BYFEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from sampling the #2 hold tank.

Process: BYGEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from sampling the continuous hydrolyzer interface tank.

Process: CAANickel kettle. Insignificant emissions from distillation receiver during receipt of product from the distillation condenser.

Process: CBLCASH System - Breathing losses associated with the Methoxy recycle tank (MS-108), batch tank MS-110 and batch tank MS-109. These tanks are intermediate tanks and are equipped with conservation vents.

Process: CCAEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from the NV still during charging.

Process: CCBEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from the #8 FAK during material charging.

Process: CCC568 tank. Working losses from the siloxane storage tank. Tank is under pad/depad.

Process: CCDEast resins. Insignificant emissions from the batch neutralizer during charging and purging.

Process: CDAEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from the equilibrators during material charging.

Process: CDBWest resins. Insignificant emissions from batch fluid hydrolysis silane weigh tank.

Process: CEAEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from the NV Still receiver during distillation.

Process: CEBEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from the #8 Precoat Tank.

Process: CECContinuous Hydrolyzer. Working losses from the Siloxane Storage Tank. Tank is under pad/depad.

Process: CEDSouth Resins. Insignificant emissions from #1 FAK.

Process: CEESouth Resins. Insignificant emissions from a precoat tank.

Process: CFAEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from the #9 FAK during material charging.

Process: CFBEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from the #10 FAK during material charging. South Resins. Insignificant emissions from a weigh tank for various Chlorosilanes.

Process: CFCEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from the #10 FAK during material charging. South Resins. Insignificant emissions from a weigh tank for various Chlorosilanes.

Process: CFDEquilibrators, NV Still, #8, #9, #10 FAKs. Insignificant emissions from the equilibrators weigh tank during material charging.

Process: CFEContinuous hydrolyzer. Insignificant emissions from the process tank 40-567.

Process: CFFContinuous hydrolyzer. Insignificant emissions from purge on filter aid kettle.

Process: CFGContinuous hydrolyzer. Insignificant emissions from purge on product holding tank #1.

Process: CFHContinuous hydrolyzer. Insignificant emissions from purge on product holding tank #2.

Process: CFMTreater filler kettles - caulker filling machine uses a small pressure vessel to fill caulkers with sealant.

Process: CGGMQ resins. Insignificant emissions from an 800 gallon acid tank.

Process: CHREast and west systems - process equipment used for special Chlorosilane hydrolysis reactions. Equipment includes hydrolyzers, condensers, filter aid kettles, blend tanks, precoat tanks, hot wells, and receivers.

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Process: CRXCASH System - The CASH process is a continuous and simultaneous reaction/distillation process. The system is best described as a continuous batch operation. This process consists of the MR-104 reactor producing different grades and solvent cleanouts.

Process: CTWCASH System - The CASH process is a continuous and simultaneous reaction/distillation process. The system is best described as a continuous batch operation. This process consists of the process scrap tanks associated with the CASH system.

Process: CWLCASH System - Working losses associated with the Methoxy recycle tank (MS-108), batch tank MS-101 and batch tank MS-109. These tanks are intermediate tanks which are used to hold product or off-spec material prior to being transferred to another process or tank.

Process: DAA is located at Building 30 - Polymer kettles and insignificant emissions from polymer kettle #4 (PK-4) used to process different Silicone compounds.

Process: DAB is located at Building 30 - Polymer kettles and insignificant emissions from polymer kettle #6 (PK-6) used to process different Silicone compounds.

Process: DAC is located at Building 30 - Polymer kettles and insignificant emissions from polymer kettles #7 (PK-7) used to process different Silicone compounds.

Process: DAD is located at Building 30 - Polymer kettles and insignificant emissions from polymer kettle #8 (PK-8) used to process polymer.

Process: DAE is located at Building 30 - Polymer kettles and insignificant emissions from polymer kettle #8 (PK-8) used to process polymer.

Process: DBB Batch Mixing Insignificant emissions from Flanders Gel Tote.

Process: DBC is located at Building 30 - Polymer kettles and insignificant emissions from ejector condensate coalescer system.

Process: DCA is located at Building 30 - Batch mixing and insignificant emissions from working losses from polymer storage tanks (grade 88679) under pressure.

Process: DCB is located at Building 30 - Batch mixing and insignificant emissions from working losses from polymer storage tank (grade 88184) under pressure.

Process: DCC is located at Building 30 - Polymer kettles and insignificant emissions from a reactor that passes through a receiver and a three stage jet scrubber (PK #4).

Process: DCD is located at Building 30 - Polymer kettles and insignificant emissions from a reactor that passes through a receiver and a three stage jet scrubber (PK #6).

Process: DCE Polymer kettles (polyhouse). Insignificant emissions from a reactor that passes through a receiver and a scrubber (PK #7).

Process: DCF is located at Building 30 - Polymer kettles and insignificant emissions from a reactor that passes through a receiver and a three stage jet scrubber (PK #8).

Process: DCRMQ Resins. The process is distillation of an acidic aqueous salty solution.

Process: DDS Drumming Stations - Drumming stations for the 2M and 4M dispersion kettles.

Process: DEABatch Mixing Insignificant emissions from Flanders Gel Tote.

Process: DEB Polymer kettles (polyhouse). Insignificant emissions during and after transfer of material to the polyhouse light-ends tank.

Process: DEC is located at Building 30 - Polymer kettles and insignificant emissions from horizontal tank 505W used to collect intermediate samples.

Process: DED Lab waste storage. Insignificant emissions from the storage of laboratory waste.

Process: DEG Maintenance shops - Cold cleaning solvent degreasing units that use a petroleum distillate solvent.

Process: DFPF Filter Press - Fluid blend filter press for the 2M and 4M Dispersion systems.

Process: DG1 Doughmixer area - doughmixers #3,5,6,7,8, and 9 vent to a hood. The doughmixers are

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batch mixers used in the production of various products.

Process: DG2Doughmixer area - doughmixers #5,6,7,8, and 9 vent to a condenser and a receiver vent.

The doughmixers are batch mixers used in the production of various products.

Process: DKABatch Mixing Insignificant emissions from flammable drum pump purging.

Process: DKBBatch Mixing Insignificant emissions from the 3000 liter north Drais mixer flammable drum pump purging operation.

Process: DKCBatch Mixing Insignificant emissions from the 3000 liter south Drais mixer flammable drum pump purging operation.

Process: DKDBatch Mixing Insignificant emissions from the liquid and flammable kitting room flammable drum pump purging.

Process: DKEBatch Mixing Insignificant emissions from liquid and flammable kitting room large transfer station exhaust hood.

Process: DKFBatch Mixing Insignificant emissions from liquid and flammable kitting room small transfer station hood.

Process: DKGBatch Mixing Insignificant emissions generated during heat-up and transfer of Thermalene heat transfer fluid.

Process: DKHBatch Mixing Insignificant emissions during heat-up and transfer of thermalene heat transfer fluid.

Process: DKIBatch Mixing Insignificant emissions from ethylene glycol process tank. Ethylene Glycol is circulated in a closed loop system.

Process: DLABatch Mixing Insignificant emissions from a fan.

Process: DM1Batch Mixing The 630 liter, the 3000 liter north, and the 3000 liter south Drais Mixers vent through a vacuum system and condensers to a wet scrubber for all parts of the mixing process other than pressure decrease steps.

Process: DM2Batch Mixing The 630 liter, the 3000 liter north, and the 3000 liter south Drais Mixers vent through a vacuum system and condensers during pressure decrease steps.

Process: DM3Batch Mixing The 630 liter, the 3000 liter north, and the 3000 liter south Drais Mixers vent through elephant trunks. The elephant trunks pick up from the mixer tops.

Process: DM4Batch Mixing The 600 liter Drair Mixer vents to a dust collector during filler charges.

Process: DM5Batch Mixing The 3000 liter north and the 3000 liter south Drais mixers vent to venturi scrubbers during filler charges.

Process: DM6Batch Mixing The 630 liter, the 3000 liter north, and the 3000 liter south Drais Mixers vent through condensers during pressure decrease steps.

Process: DM7Batch Mixing The 630 liter, the 3000 liter north, and the 3000 liter south Drais Mixers vent through condensers to a wet scrubber for all parts of the mixing process other than pressure decrease steps.

Process: DPATetramer Tank Insignificant emissions from Tetramer process tank under nitrogen purge.

Process: DPBHMDZ Process Tank for TFKs Insignificant emissions from Hexamethyl Disilazane (HMDZ) process tank under Nitrogen purge.

Process: DPCDoughmixer Area Insignificant emissions from catalyst process weigh tank.

Process: DQATFK Weigh Hopper Insignificant emissions from TFK weigh hopper.

Process: DQBTFK Weigh Hopper Insignificant emissions from TFK weigh hopper.

Process: DQCTFK Weigh Hopper Insignificant emissions from TFK weigh hopper.

Process: DQDTFK Weigh Hopper Insignificant emissions from TFK weigh hopper.

Process: DQETFK weigh hopper. Insignificant emissions from TFK weigh hopper.

Process: DQGTreater Filler Kettle - Filler Charging Insignificant emissions from treater filler kettle

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charging procedures are sent to a dust collector.

Process: DQHTreater Filler Kettle - Filler Charging Insignificant emissions from treater filler kettle filler charging procedures are sent to a dust collector.

Process: DRMSealants - Insignificant emissions from the drumming of sealants.

Process: DSHFluorosilicone Cracker. Emissions from a drum filling station fume exhaust hood.

Process: DUAWP-2 Extruders. This process consists of two sources. One source is an exhaust fan which removes vapors from a drum unloading area., and the other is a vacuum pump which pulls vacuum on a process system.

Process: DVSDoughmixer Area The Doughmixer vacuum cleaning system is equipped with a fabric filter and is used to remove spilled filler material from the floor of Building 30.

Process: DWAWP-1 Extruder Insignificant emissions from working losses of siloxane storage tank.

Process: DWBWP-1 Extruder Insignificant emissions from stanking storage losses of siloxane storage tank.

Process: DWCWP-1 Extruder Insignificant emissions from working losses of siloxane storage tank.

Process: DWDWP-1 Extruder Insignificant emissions from stanking storage losses of siloxane storage tank.

Process: DWEWP-1 Extruder Insignificant emissions from working losses of siloxane storage tank.

Process: DFWWP-1 Extruder Insignificant emissions from standing storage losses of siloxane storage tank.

Process: DWGWP-1 Extruder/WP-4 Extruder Insignificant emissions from working losses of siloxane storage tank.

Process: DWHWP-1 Extruder/WP-4 Extruder Insignificant emissions from stanking storage losses of Siloxane storage tank.

Process: DWIWP-1 Extruder Insignificant emissions from working losses of Siloxane storage tank.

Process: DWJWP-1 Extruder Insignificant emissions from standing storage losses of Siloxane storage tank.

Process: EDT is located at Building 30 - Polymer kettles and ejector condensate solvent decanter tank for polymer kettles

Process: EHAContinuous polymerization unit (CPU). Insignificant emissions from working losses from 10,000 gallon product storage tank under pad/depad.

Process: EL2Elephant trunk 2 for 100 column. This process consists of elephant trunk 2 for the 100 column.

Process: ELA1500 Phenyl reactor (Diol & Tetramer). Insignificant emissions from a dryer fed with wet Phenyl Tetramer.

Process: EMADimethyl fluids. Insignificant emissions from a mechanical vacuum system serving two evaporators-this being a thin film evaporator (LUWA).

Process: EMBDimethyl fluids. Insignificant emissions from a mechanical vacuum system serving two evaporators-this being a cyclone evaporator (EPU-APV).

Process: EMCRodney Hunt Stripper. Insignificant emissions from the Rodney-Hunt Evaporator.

Process: EMDRodney Hunt Stripper. Insignificant emissions from hot well.

Process: EME2M Hydro Blend Kettle. Insignificant emissions from the 2M hydrolyzer stirred, closed blend kettle.

Process: ENAContinuous polymerization unit (CPU). Insignificant emissions from 2000-gallon vessel used to collect polymer from the continuous polymerization system.

Process: ENBContinuous polymerization unit (CPU). Insignificant emissions from working losses from storage tank 80-531-00.

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Process: ENCDimethyl fluids. Insignificant emissions from standing storage losses from Siloxane Storage Tank 80-531-00.

Process: END2M hydrolyzer system. This process includes emissions from a 2000 gallon hydrolyzer.

Process: EOATank/Wagon Transfer - Insignificant emissions from tank wagon transfer to tanks 48-534-01 and 02 for storage.

Process: EOB1500 Phenyl Reactor (Diol & Tetramer). Insignificant emissions from working losses from product storage tank 47-526 under pad/depad.

Process: EPA1500 Phenyl Reactor (Diol & Tetramer). Insignificant emissions from Phenyl Tetramer surge tank.

Process: EPB1500 PUFA. Insignificant emissions from 1500 PUFA charge port.

Process: EPC1500 PUFA. Insignificant emissions from 1500 PUFA south receiver.

Process: EPD1500 PUFA. Insignificant emissions from knock-out tank located in vacuum line between the 1500 PUFA reactor system and ejector system.

Process: EQAGroup 1, 300 GP kettle. The 300 general kettle system produces small batches of fluids for pressure-sensitive adhesives and other Silicone-based products.

Process: EQB1500 Phenyl reactor (Diol & Tetramer). Insignificant emissions from Diol surge tank.

Process: EQD1500 PUFA. Insignificant emissions from 1500 gallon PUFA weigh tank (#47-518).

Process: EQQ1000 gal & FAK equilibrators. This process consists of a 1000 gal equilibrator with an associated distillation column and another 1000 gal FAK equilibrator.

Process: ERAGroup 1, 3000 FAK. Trace emissions vented during charging to the 3000 FAK. The 3000 FAK system batch processes pressure-sensitive adhesives and other silicone-based products.

Process: ERBMaterials blended in kettles

Process: ERCGroup 1, 300 GP kettle. The 300 general kettle system produces small batches of fluids for pressure-sensitive adhesives and other Silicone-based products.

Process: ERD100 column 513A receiver. Insignificant emissions from the 100 distillation column 513A receiver.

Process: ERE100 column 514 receiver. Insignificant emissions from the 100 distillation column 514 receiver.

Process: ERF100 column 513C receiver. Insignificant emissions from the 100 distillation column 513C receiver.

Process: ERG100 column 513D receiver. Insignificant emissions from the 100 distillation column 513D receiver.

Process: ERH100 column 513B receiver. Insignificant emissions from the 100 distillation column 513B receiver.

Process: ESDEast System - This dust collector unit accepts emissions from the loading of two charging hoppers. The Dust Collector system consists of two charging hoppers, the product/air conveyance ducts, and the dust collector.

Process: ESHEast and south hydrolyzers. Emissions from the east and south hydrolyzers that vent to water scrubbers that discharge to the chem sewers.

Process: ESVEast Sytem - This process consists of the East System Flter Press.

Process: EVA is located at Building 37 - Insignificant emissions from north emulsion premix tank.

Process: EVB is located at Building 37 - Insignificant emissions from south premix tank.

Process: EVC is located at Building 37 - Insignificant emissions from north emulsion blend tank

Process: EVD is located at Building 37 - Insignificant emissions from south emulsions blend tank

Process: EVE1500 Phenyl reactor (Diol & Tetramer). Insignificant emissions from the crystallizer.

Process: EVF1500 Phenyl Reactor (Diol & Tetramer). Insignificant emissions from the Phenyl Tetramer

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system centrifuge.

Process: EVG1500 Phenyl reactor (Diol & Tetramer). Insignificant emissions from the 2000 gallon hydrolyzer (precoat tank).

Process: EVH1500 Phenyl reactor (Diol & Tetramer). Insignificant emissions from the Phenyl Tetramer hopper (off dryer).

Process: EVI1500 Phenyl reactor (Diol & Tetramer). Insignificant emissions from a hopper that vents during transfer of cellite.

Process: EVJ1500 PUFA. Insignificant emissions from fluid slurry tank charge port.

Process: EVK1500 PUFA. Insignificant emissions from 1500 PUFA receiver when man-hole is open.

Process: EVS is located at Building 30 - Polymer kettles and ejector system vents for polymer kettles 1, 2, 3 and 5.

Process: EWBEast and West Systems - Standing losses from atmospheric storage tanks. The storage tanks are used to hold Silicon Tetrachloride and Phenyltrichlorosilane.

Process: EWLEast and West Systems - Working losses from Methyl and Hexyl Trichlorosilane storage tanks. The tanks are under a Nitrogen pad/depad system.

Process: EWWEast and West Systems - Working losses from atmospheric storage tanks. The tanks are used to store Silicon Tetrachloride and Phenyltrichlorosilane.

Process: EXA is located at Building 37 - Insignificant emissions from emulsions system 50-305

Process: EXB4000 PUFA. Insignificant emissions from PUFA slurry tank 47-309.

Process: EYA is located at Building 37 - Insignificant emissions from emulsion system tank 50-306

Process: EYB is located at Building 37 - Insignificant emissions from emulsion systems tank 50-307

Process: EYC is located at Building 37 - Insignificant emissions from emulsion systems tank 50-308

Process: EYD is located at Building 37 - Insignificant emissions from emulsion systems tank 50-503

Process: EYE is located at Building 37 - Insignificant emissions from emulsion systems tank 50-509

Process: FAHMQ Resins. Various filter aids are added to a hopper for subsequent addition to a filter precoat tank.

Process: FBADimethyl fluids. Insignificant emissions from a fitrol addition slurry tank.

Process: FBEDimethyl fluids. Insignificant emissions from working losses from Siloxane storage tank 41-501.

Process: FBDDimethyl fluids. Insignificant emissions from standing storage losses from Siloxane storage tank 41-501.

Process: FBEDimethyl fluids. Insignificant emissions from working losses from Siloxane storage tank 48-514-01.

Process: FBFDimethyl fluids. Insignificant emissions from standing storage losses from siloxane storage tank 48-514-01.

Process: FBGContinuous polymerization unit (CPU). Insignificant emissions from vacuum jet ejectors. Vacuum stripping of polymers produced in the CPU.

Process: FBHContinuous polymerization unit (CPU). Insignificant emissions from vacuum jet ejectors. Vacuum stripping of polymers produced in the NPK.

Process: FBICContinuous polymerization unit (CPU). Insignificant emissions from ejector jet knock-out tank.

Process: FCADimethyl fluids. Insignificant emissions from working losses from Siloxane storage tank 48-515-01.

Process: FCBDimethyl fluids. Insignificant emissions from standing storage losses from siloxane storage tank 48-515-01.

Process: FCCDimethyl fluids. Insignificant emissions from working losses from Siloxane storage tank

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48-514-02.

Process: FCDDimethyl fluids. Insignificant emissions from standing storage losses from Siloxane storage tank 48-514-02.

Process: FCEDimethyl fluids. Insignificant emissions from working losses from Siloxane storage tank 48-514-03.

Process: FCFDimethyl fluids. Insignificant emissions from standing storage losses from siloxane storage tank 48-514-03.

Process: FCGDimethyl fluids. Insignificant emissions from working losses from Siloxane storage tank 48-514-04.

Process: FCHDimethyl fluids. Insignificant emissions from standing storage losses from Siloxane storage tank 48-514-04.

Process: FCIArtisan evaporator, stripper. Insignificant emissions from Artisan stripper blend tank 47-302.

Process: FCSFilter Cleaning Station for the 2M and 4M Dispersion Systems.

Process: FDADimethyl fluids. Insignificant emissions from working losses from Siloxane storage tank 48-515-02.

Process: FDBDimethyl fluids. Insignificant emissions from standing storage losses from Siloxane storage tank 48-515-02.

Process: FDCDimethyl fluids. Insignificant emissions from working losses from Siloxane storage tank 48-515-03.

Process: FEEDimethyl fluids. Insignificant emissions from standing storage losses from Siloxane storage tank 48-515-03.

Process: FDFDimethyl fluids. Insignificant emissions from working losses from SF96-350 storage tank number 41-599-010.

Process: FDGDimethyl fluids. Insignificant emissions from standing storage losses from SF96-350 storage tank number 41-599-010.

Process: FDH is located at Building 37 - Dimethyl fluids. Insignificant emissions from working losses from storage tank for 81798.

Process: FDIDimethyl fluids. Insignificant emissions from standing storage losses from storage tank for 81798.

Process: FEADimethyl fluids. Insignificant emissions from working losses from storage tank 41-599-009.

Process: FEBDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 41-599-009.

Process: FECDimethyl fluids. Insignificant emissions from working losses from storage tank 48-539-001.

Process: FEDDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-539-001.

Process: FEEDimethyl fluids. Insignificant emissions from working losses from storage tank 48-539-002.

Process: FEGDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-539-002.

Process: FEHDimethyl fluids. Insignificant emissions from working losses from storage tank 48-539-003.

Process: FEIDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-539-003.

Process: FEJDimethyl fluids. Insignificant emissions from working losses from storage tank 48-539-004.

Process: FEKDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-539-004.

Process: FFADimethyl fluids. Insignificant emissions from working losses from storage tank 50-506A.

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Process: FFB is located at Building 37 - Dimethyl fluids. Insignificant emissions from standing losses from storage tank 50-506A.

Process: FFCDimethyl fluids. Insignificant emissions from working losses from storage tank 48-517-01.

Process: FFDDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-517-01.

Process: FFEDimethyl fluids. Insignificant emissions from working losses from storage tank 48-517-02.

Process: FFFDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-517-02.

Process: FFGDimethyl fluids. Insignificant emissions from working losses from storage tank 48-517-03.

Process: FFHDimethyl fluids. Insignificant emissions from standing storage losses from siloxane storage tank 48-517-03.

Process: FFIDimethyl fluids. Insignificant emissions from working losses from storage tank 48-517-04.

Process: FFJDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-517-04.

Process: FFKDimethyl fluids. Insignificant emissions from working losses from storage tank 48-522-01.

Process: FFLDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-522-01.

Process: FFMDimethyl fluids. Insignificant emissions from working losses from storage tank 48-306-00.

Process: FFNDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-306-00.

Process: FFODimethyl fluids. Insignificant emissions from working losses from storage tank 48-529-00.

Process: FFPDimethyl fluids. Insignificant emissions from standing storage losses from storage tank 48-529-00.

Process: FFQNPK receiver. Insignificant emissions from the NPK receiver.

Process: FFREductor system. Insignificant emissions from the Phenyl Tetramer eductor system.

Process: FGAArtisan evaporator, stripper. Insignificant emissions from working losses from product storage tank 41-599-014 under pad/depad.

Process: FGGArtisan scrubber. Insignificant emissions from the artisan scrubber system.

Process: FHCFluorosilicone cracker. Insignificant emissions from Fluorosilicone hydrolyzate being converted to Fluorosilicone in the cracker.

Process: FK1Filter aid kettles. This process represents the material charging and receiving steps of the filter aid kettles.

Process: FK2Filter aid kettles. This process represents the sampling steps of the filter aid kettles.

Process: FKPFilter aid kettle presses and tanks. Vapors emitted from presses and tanks during sampling.

Process: FLA is located at Building 41 - Insignificant emissions from a 2000 gallon process tank

Process: FLB is located at Building 41 - Insignificant emissions from 6000 gallon process tank

Process: FLC is located at Building 41 - Insignificant emissions from fume hood

Process: FNARubber Packing (Rubber Mills) Insignificant emissions from Silicone Rubber Mill #1.

Process: FNBRubber Packing (Rubber Mills) Insignificant emissions from Silicone Rubber Mill #2.

Process: FNCRubber Packing (Rubber Mills) Insignificant emissions from Silicone Rubber Mill #3.

Process: FNERubber Packaging Insignificant emissions from transfer of treated filler from bulk silo with fluidizing inert gas.

Process: FPR1500 Phenyl reactor (Diol and Tetramer). A batch system used to manufacture Phenyl and Phenyl Tetramer.

Process: FSADimethyl fluids. Insignificant emissions from vacuum system separator.

Process: GP3Group 1, 300 GP kettle. Batches of fluids are produced for pressure-sensitive adhesives and

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other products.

Process: GVSBatch Mixing General house vacuum system vents to a dust collector.

Process: HAACASH System. Insignificant emissions from coolant drum MS-114.

Process: HABBuilding 76 Tank Farm. Insignificant emissions from breathing losses from 14,000 gallon horizontal Acetic Anhydride storage tank.

Process: HACBuilding 76 Tank Farm. Insignificant emissions from filling losses from 14,000 gallon horizontal Acetic Anhydride storage tank.

Process: HASEast and West Hydrolyzers. The East and West Hydrolyzers vent to the East and West High Acid Scrubbers.

Process: HBABuilding 76 Tank Farm. Insignificant emissions from breathing losses from Acetone storage tank, under pressure.

Process: HBBBuilding 76 Tank Farm. Insignificant emissions from breathing losses from aromatic hydrocarbon storage tank, under pressure.

Process: HBVHopper bin vents for the 630 liter, 3000 liter north, and 3000 liter south Drais Mixers vent to a dust collector.

Process: HHAFluorosilicone doughmixer. Insignificant emissions from fume exhaust hood over doughmixer when mixer is opened to empty vessel.

Process: HHBFluorosilicone doughmixer. Insignificant emissions from fume exhaust hood over doughmixer when solvent is removed through the hood.

Process: HHCFluorosilicone doughmixer. Insignificant emissions from fume exhaust hood over doughmixer when vapor is removed due to displacement from drum filling from light ends receiver.

Process: HHDFluorosilicone doughmixer. Insignificant emissions from fume exhaust hood over doughmixer when vapor is removed due to displacement from drum filling from decanter.

Process: HHEPolykettles. Insignificant emissions from polymer production system kettle.

Process: HHFPolykettles. Insignificant emissions from batch kettle PK-9, with condenser and receiver.

Process: HHGThin film evaporator. Insignificant emissions from working losses from light ends storage tank under pad/depad.

Process: HHHThin film evaporator. Insignificant emissions from working losses from Siloxane storage tank.

Process: HHIThin film evaporator. Insignificant emissions from standing storage losses from Siloxane storage tank.

Process: HIAPolykettles. Insignificant emissions from vent for polykettle PK-9, 10, 11 vacuum ejector system.

Process: HIBPolykettles. Insignificant emissions from lift station hot-well vent for light ends that pass through ejectors.

Process: HICPolykettles. Insignificant emissions from batch reactor with condenser, receiver and vacuum system.

Process: HIDPolykettles. Insignificant emissions from batch kettle PK-11.

Process: HIEPolykettles. Insignificant emissions from polykettle 12.

Process: HIFPolykettles. Insignificant emissions from vacuum ejector vent for polykettle 12.

Process: HJAPolykettles. Insignificant emissions from polykettle 14.

Process: HJBThin film evaporator. Insignificant emissions from north TFE feed tank.

Process: HJCThin film evaporator. Insignificant emissions from south TFE feed tank.

Process: HJDThin film evaporator. Insignificant emissions from a light ends tank.

Process: HOATreater filler kettles - insignificant emissions from Tetramer feed tank.

Process: HOBTreated Filler Kettles. Insignificant emissions from working losses from Tetramer storage

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tank.

Process: HOCTreated Filler Kettles. Insignificant emissions from standing storage losses from Tetramer storage tank.

Process: HOEWP-3 Extruders. Insignificant emissions from working losses from storage tank 898-506. Tank is under pressure.

Process: HPAWP-3 Extruders. Insignificant emissions from vacuum pumps used to pull vacuum on a mixer extruder.

Process: HPBWP-3 Extruders. Insignificant emissions from storage tank 8275-502 equipped with a vapor balance return line. It is also equipped with a conservation vent.

Process: HQAEnd Capper. Insignificant emissions from working losses from Silicone polymer storage tank, Tank C number 898-505, under pressure.

Process: HQBEnd Capper. Insignificant emissions from packed columns 8275-427-023AB and 025A.

Process: HRAEnd Capper. Insignificant emissions from a gas separation chamber for a catalyst feed line.

Process: HRBEnd Capper. Insignificant emissions from a gas separation chamber for a catalyst feed line.

Process: HRCWP-2 Extruders. Insignificant emissions from a gas separation chamber for a catalyst feed line.

Process: HRDWP-2 Extruders. Insignificant emissions from a gas separation chamber for a catalyst feed line.

Process: HSAWP-2 Extruders. Insignificant emissions from a gas separation chamber for a catalyst feed line.

Process: HSBWP-2, WP-3 Extruders, Gas Separation Chambers - Insignificant emissions from WP2, WP3 Extruders, and Gas Separation.

Process: HSCWP-2 Extruders. Insignificant emissions from a gas separation chamber for a catalyst feed line.

Process: HSDWP-2 Extruders. Insignificant emissions from working losses from Silicone polymer storage tank 898-503-C with Nitrogen pad/depad.

Process: HSEEnd Capper. Insignificant emissions from working losses of Silicone polymer storage tank under pressure.

Process: HTAWorking losses from the four pigment tanks are used to store liquid pigment dispersions. The vessels vent to the atmosphere when the vessels are charged from the drums the vessels vent to a common conservation vent header.

Process: HTBStanding storage losses from four pigment tanks are used to store liquid pigment dispersions. The vessels vent to the atmosphere when the vessels are charged from the drums. The vessels vent to a common conservation vent header.

Process: HVAWP-2 Extruders. Insignificant emissions from working losses from siloxane storage tank 898-503A with Nitrogen pad/depad.

Process: HVBWP-2 Extruders. Insignificant emissions from working losses from Siloxane storage tank 898-503B with Nitrogen pad/depad.

Process: HXT4000 PUFA. This process consists of a 1-Hexene process tank.

Process: LABWP1/WP4 Extruders Standing storage losses from three storage tanks. The tanks are used to store Gamma-Aminopropyltriethoxysilane (GAP), Hydride, and ES40. The tanks are equipped with conservation vents.

Process: LASRubber Packaging. This process consists of stations to feed liquid additives from drums to the Banberry Mixers. There are two vents with Nitrogen purge.

Process: LAVWP1/WP4 Extruders Tote/drum transfer stations.

Process: LAWWP1/WP4 Extruders Working losses from three storage tanks. The tanks are used to

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store Gamma-Aminopropyltriethoxysilane (GAP), Hydride, and ES40.

Process: LKRBatch Mixing Elephant trunk from polymer drumming in the liquid kitting room.

Process: MSS4000 PUFA. Methyl Styrene storage tank working losses.

Process: ODC100 distillation column. Produces various chainstoppers and distills other systems' byproducts. Vapors are condensed and taken off to various receivers.

Process: PAV1500 PUFA/4000 PUFA. This process consists of vessels in the 1500 and 4000 PUFA areas.

Process: PDMFluorosilicone doughmixer. A polymerizer-doughmixer is used to convert a Fluorosilicone Monomer to a Fluorosilicone Polymer.

Process: PKE4M PK reactor. This process consists of a 4000 gal polymer receiver which vents through an ejector.

Process: PKR4M PK reactor. This process consists of a 4000 gal polymer reactor which vents through a reflux condenser.

Process: PRBBreathing losses from Storage tanks.

Process: PRL4000 PUFA. This process consists of the 4000 PUFA reactor condenser.

Process: PRS1500 PUFA. This process consists of the main vent for the 1500 PUFA reactor.

Process: PRWWorking losses from storage tanks.

Process: PTTInsignificant emissions from loading of a piston-truck in building 85 (sealants).

Process: PYK is located at Building 30 - Polymer kettles #1, 2, 3 and 5 for processing different Silicone products.

Process: RCCTreater Filler Kettles The Methyl Tetramer (D4) recovery system consists of a vapor condensing tower, a D4 circulating tank, a knock out pot, and a light-ends weigh tank. D4 vapor and Nitrogen are released from treated filler kettles and transferred to the recovery system.

Process: RH1Rodney Hunt stripper. A continuous stripper, where the material is stripped into specification.

Process: RHSRodney Hunt stripper. A continuous stripper, where the material is stripped into specification.

Process: RK1Batch Mixing Vent from a 25 gallon kettle (Ross Mixer) directly to the atmosphere.

Process: RK2Batch mixing. A 25 gallon kettle (Ross kettle) vents through a vacuum pump.

Process: SHHFluorosilicone cracker. Exhaust hood over the solids hopper bag dumping station.

Process: SKVSpecialty Kettle - The specialty kettle is a batch reactor/blend tank used to manufacture primers for paper-release intermediates, vinyl polymers, catalyst blends, and other specialty fluids. Associated equipment includes filter and cuno presses.

Process: SP2MQ Resins. Resins and polymers are held for further processing in a closed, stirred process kettle.

Process: SPKMQ Resins. Stirred process kettles for the #5#12 FAKs system located in Building 24.

Process: SSE300 SS equilibrator. Produces small batches of electronic-junction coatings & compounds used in electronics packaging industry.

Process: TABTreater Filler Kettles Breathing losses from 12 product storage tanks, each with a capacity of 7500 gallons. The tanks are used to store volatile organic liquids.

Process: TAWTreater Filler Kettles Working losses from 12 product storage tanks, each with a capacity of 7500 gallons. The tanks are used to store volatile organic liquids.

Process: TBBTreater Filler Kettles Breathing losses from product storage tanks T-522N and T-523M. The tanks are used to store volatile organic liquids.

Process: TBWTreater Filler Kettles Working losses from product storage tanks T-522N and T-523M. The tanks are used to store volatile organic liquids.

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Process: TFE Thin film evaporator. A thin film evaporator fitted with a mechanical vacuum system.

Process: TFR Treater Filler Kettles Treater filler kettles are used to treat raw fillers with Methyl Tetramer. Methyl Tetramer vapors are discharged to a condenser/receiver system.

Process: TFS Treater filler kettle - treater filler kettle is used to treat raw filler with HMDZ. HMDZ vapors are discharged to receiver and ultimately to a packed tower scrubber. Tank wagon emissions also vented to scrubber.

Process: TFU Tetramer Tank Treater filler kettles tetramer process tank under continuous Nitrogen purge.

Process: TK1 Building 76 Tank Farm. Emissions from breathing losses from 30,000 gallon Toluene storage tank 2650-536, under pressure.

Process: TK2 Building 76 Tank Farm. Emissions from working losses from 16,000 gallon Acetic Acid storage tank, under pressure

Process: TKA Transfer and Blending - Working losses from Tanks 537N/S and 503A.

Process: TKB Transfer and Blending. Standing storage losses from Tanks 537N/S and 503A.

Process: TKC Transfer and Blending. Working losses from Tank 538. The tank is under a Nitrogen pad/dapad system.

Process: TKD Transfer and Blending. Working losses from Isopropanol storage tank.

Process: TKE Transfer and Blending. Standing storage losses from Isopropanol storage tank.

Process: TKF Transfer and Blending. Material is charged to solvent still (process) tank 64-303.

Process: TKSMQ Resins. Tanks for accumulating solvents, a vessel used as a temporary hold tank and a 800 gallon HCL tank.

Process: TTST Transfer and blending. Standing storage losses from Toluene storage tank 503A.

Process: TTU Transfer truck unloading. Tank wagon loading/unloading station.

Process: TTW Transfer and blending. Working losses from Toluene storage tank 503A.

Process: TWLE East and West Systems - Tank and trailer loading and unloading operations. The following materials are transferred: finished product grades, Silane, Acetyl Chloride, APS, and t-Butanol.

Process: W1BWP-1 Extruder Standing storage losses from siloxane storage tank 323. The tank vent is under pressure.

Process: W1WWP-1 Extruder Working losses from siloxane storage tanks 323.

Process: WDUWP-1 Catalyst in 55-gallon drums is stored in a hot room to prevent freezing. Periodically, catalyst is pumped from drums to a storage tank in the hot room. Room is ventilated by fan exhausted to the atmosphere.

Process: WEBE East and West Systems - Standing losses from atmospheric storage tanks. The tanks are used to store Acetyl Chloride waste, and Silane blend.

Process: WEWE East and West Systems - Working losses from atmospheric storage tanks. The tanks are used to store Acetyl Chloride waste, and Silane blend.

Process: WP1WP1/WP4 Extruders The vacuum vent ports of the WP-1 and WP-4 mixers are exhausted by suction from two liquid ring vacuum pumps. The exhaust from the two vacuum pumps passes through two carbon beds placed in series.

Process: WPEWP-2, WP-3 Extruders - Dust collector system collects dust laden air and removes particles in cartridge type filter elements.

Process: WPF is located at Building 30 - Fugitive emissions WP1, & WP4.

Process: WPTWP2, WP3 Tanks - This process represents working losses from volatile organic liquid storage tanks used in the WP-2 and WP-3 operations. Tanks are under pressure or have a Nitrogen blanket.

Process: WSD West System - This dust collector unit accepts emissions from the loading of two charging

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hoppers. The Dust Collector system consists of two charging hoppers, the product/air conveyance ducts, and the dust collector.

Process: WSPWest System - manufactures products such as auto polishes, masonry water repellent, impregnant for roofing granules, and process aids for rubber production. It is a batch system that is a hydrolysis system. Associated equipment includes a filter press.

Process: WTA4000 PUFA. This process consists of the weigh tank for the 4000 PUFA system.

Process: WTB4000 PUFA. Insignificant emissions from the weigh tank for the 4000 PUFA system.

Emission unit C61007 - Silicon grinding area and fines passivation area. In the silicon grinding area, silicon metal is ground, screened, and transferred to silos. In the fines passivation area, mixers are used to mix fines to neutralize and harden the material.

Emission unit C61007 is associated with the following emission points (EP):

61001, 61002, 61003, 61005, 61006, 61007, 61008, 61009, 61010, 61801, 61802, 61805

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

Process: FZA is located at Building 61 - Silicon grinding. Insignificant emissions from dust resulting from the unloading of rail cars of Silicon.

Process: FZB is located at Building 61 - Silicon grinding. Insignificant emissions from the powder vents east dust collector TSW-610327.

Process: FZC is located at Building 61 - Silicon grinding. Insignificant emissions from the grinding west dust collector TSW-610335.

Process: GCA is located at Building 61 - Fines passivation. Fines are mixed with Lignin and water to neutralize and harden the material. Associated equipment is a mixer.

Process: GCB is located at Building 61 - Fines passivation. Fines are mixed with Lignin and water to neutralize and harden the material. Associated equipment is a mixer.

Process: GCC is located at Building 61 - Fines passivation. Fines are mixed with Lignin and water to neutralize and harden the material. Associated equipment is a bag dump station.

Process: GNA is located at Building 61 - Silicon grinding. Insignificant emissions from dust filter TSW-610328.

Process: SGO is located at Building 61 - Old Silicon grinding plant - unloads Silicon metal from rail cars to buffer silo. Silicon is fed from buffer silo to ball mill. Ball mill grinds Silicon and discharges ground powder to screener. Finished product is placed in silos; oversize material is recycled from screener to mill.

Emission unit U28002 - Emission Unit U28002 consists of Boilers 13 and 18 and a #2 Fuel Oil storage tank.

Emission unit U28002 is associated with the following emission points (EP):

28002, 28006, 28013, 28020

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

Process: 18GBoiler 18 - natural gas combustion.

Process: 18O is located at Building 28 - #2 fuel oil combustion for boiler #18

Process: C6OBoiler 13 - Number 6 fuel oil combustion.

Process: CNGBoiler 13 - Natural gas combustion.

Process: UTBBreathing losses for fuel oil tank.

Process: UTWWorking losses for fuel oil tank (15,000 gallon design capacity).

Emission unit U28003 - Emission Unit U28003 consists of boilers 14, 15, 16, and 17.



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Emission unit U28003 is associated with the following emission points (EP):
28003, 28004, 28005

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

Process: A6OBoilers 15 - number 6 fuel oil combustion.

Process: ANG is located at Building 28 - Boiler 15 - Natural gas combustion.

Process: B6O is located at Building 28 - Boiler 14 - Number 6 fuel oil combustion.

Process: BNG is located at Building 28 - Boiler 14 - Natural gas combustion.

Process: UNG is located at Building 28 - Boiler 17 - Natural gas combustion.

Process: VNG is located at Building 28 - Boiler 16 - Natural gas combustion.

Emission unit C62008 - Chemops - MCSII, MCSIII and MCSIV operations. All equipment associated with the MCSII, MCSIII and MCSIV production operations, with the exception of the MCS vent scrubbers and MCS vent incinerator.

Emission unit C62008 is associated with the following emission points (EP):
55001, 55005, 55006, 55007, 57001, 57004, 62008, 62009, 62012, 64001, 65001, 65002, 65003

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

Process: FWAMCS-3 Oil Surge Tank working losses.

Process: FWBMCS-3 Glycol Surge Tank - Working losses.

Process: GIA is located at Building 64 - MCS2 (64) Glycol Surge Tank - Breathing losses.

Process: GIB is located at Building 64 - MCS-2 (64) Glycol Surge Tank - Working losses.

Process: GJAMCS-2 (65) Glycol Surge Tank - Breathing Losses.

Process: GJBMCS-2 Oil Surge Tank - Working Losses.

Process: GJCMCS-2 Oil Surge Tank - Breathing Losses.

Process: GJDMCS-2 Oil Surge Tank Working Losses

Process: MCB is located at Building 62 - MCS Tank - Breathing Losses. This process represents the breathing losses from a storage tank in the MCS production operations.

Process: MCW is located at Building 62 - MCS-Tanks - Working Loss - This process consists of Working Losses from tanks in the MCS production operation.

Process: OFGMCS Hot oil furnaces burning natural gas

Process: OFOMCS Hot oil furnaces with limits on #2 fuel oil.

Process: VSC is located at Building 62 - Vacuum system used for catalyst transfer into catalyst feed hopper.

Process: VSFVacuum system for catalyst transfer into catalyst feed hopper.

Emission unit W97004 - This Emission Unit is the wastewater treatment process system of the waste handling area. The wastewater treatment plant is a physical/chemical treatment system consisting of pH neutralization, oil and grease separation, clarification, and air stripping operations.

Emission unit W97004 is associated with the following emission points (EP):
95002, 97004, 97005, 97008, 97011, 97012, 97015, 97016, 97017, 97018, 97019, 97020, 97021,
97041, 97042, 97043, 97044

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

Process: ASSWaste Water Treatment Plant - Air stripper system purge at incinerator No. 2 and the RKI (incinerator No.3).

Process: CTTWaste Water Treatment Plant - 2.2 million gallon open top tanks used to provide equalization and mixing of wastewater prior to introduction to the bio reactors.

Process: HCSWaste Water Treatment Plant - Standing storage losses from a HCL storage tank holding

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HCL for use in the Waste Water Treatment Plant.

Process: HCWaste Water Treatment Plant - Working losses from a HCL storage tank holding HCL for use in the Waste Water Treatment Plant.

Process: IFAWaste Water Treatment Plant - Insignificant emissionf from 8000 gallon vertical tank used for batch neutralization.

Process: IFBWaste Water Treatment Plant - Insignificant emissions from balance lines serving three APS equalization tanks.

Process: IFCWaste Water Treatment Plant. Insignificant emissions from a vertical, open-top aerated biological treatment tank.

Process: IFDWaste Water Treatment Plant - Insignificant emissions from a vertical, open-top aerated biological treatment tank.

Process: LSSWaste Water Treatment Plant - A lime storage silo emits lime dust through a fabric filter.

Process: NEUWaste Water Treatment Plant - 5,000 gallon neutralization tank which receives non-aqueous phase material and neutralizes it with KOH.

Process: NPSWaste Water Treatment Plant - Emissions from standing storage losses from a 5,000 gallon tank storing NPS which is a blend of silicone compounds, water and solvents.

Process: NPWWaste Water Treatment Plant - Emissions from working losses from a 5,000 gallon tank storing NPS which is a blend of Silicone compounds, water and solvents.

Process: PSTWaste Water Treatment Plant - Insignificant emissions from a vertical, open-top aerated biological treatment tank.

Process: SOSWaste Water Treatment Plant - Insignificant emissions from standing losses from 23,750 gallon tanks which receive non-polar solvents. The tanks are under Nitrogen, with conservation vents.

Process: SOTWaste Water Treatment Plant - Emissions from working losses from 23,100 gallon tanks which receive non-polar solvents. The tanks are under nitrogen, with conservation vents.

Process: STKWaste Water Treatment Plant - Two 5,500 gallon tanks which receive non-aqueous phase liquid layers from the chemical sewer oil separator. The tanks are Nitrogen blanketed.

Process: STSWaste Water Treatment Plant - emissions from standing storage losses from 21,700 gallon horizontal storage tanks.

Process: STWWaste Water Treatment Plant - emissions fro working losses from 21,700 gallon horizontal storage tanks.

Process: USTUnderground storage tanks receiving acidic aqueous polar and non-polar solvent containing wastewater via sewer pipe.

Emission unit T14009 - This unit consists of equipment in the facility's Pilot Plant. Batch and semicontinuous processes occur here. The Pilot Plant makes developmental/experimental products for evaluation, and scaled-down batches of problem production grades to develop process adjustments.

Scaled down batched of commercial products are also made here.

Emission unit T14009 is associated with the following emission points (EP):

14006, 14007, 14008, 14009, 14010, 14011, 14013, 14014, 14015, 15005, 15013, 15027, 15028, 15075, 15081, 15091, 15103, 15105, 15106, 15108, 15109, 15110, 15111, 15112, 15113, 15116, 15117, 16001, 16004

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

Process: AFAInsignificant emissions from elephant trunks used to collect chemical by-products from drums of RTV sealant.

Process: AFBInsignificant emissions from elephant trunks used to collect chemical by-products from drums of RTV sealant.

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Process: AFCInsignificant emissions from Acrylates process area ventilation system.
Process: AJAInsignificant emissions from 50 gallon hydrolyzer.
Process: AJBInsignificant emissions from the 30 gallon receiver for the 50 gallon hydrolyzer.
Process: AJC50HYDRO to 15028 - Insignificant emissions from 50 gallon hydrolyzer during vacuum stripping.
Process: AQARBK ATM Vent - Insignificant emissions from 50 gallon RBK (Resin Body Kettle) reactor.
Process: AQBRBK Receiver ATM Vent - Insignificant emissions from receiver for 50 gallon RBK reactor.
Process: ARA100 gal TFE Feed Tank - Insignificant emissions from a 100 gallon TFE feed tank.
Process: ARBTFE Vacuum Pump - Insignificant emissions from a vacuum pump connected to the Turba thin film evaporator.
Process: ARDInsignificant emissions from the 50 SS vessel through a liquid ring vacuum pump.
Process: ARERBK to 15109 - Insignificant emissions from the RBK vessel through a liquid ring vacuum pump.
Process: ARF50HYDRO to 15109 - Insignificant emissions from the 50 Hydrolysis vessel through a liquid ring vacuum pump.
Process: ARG100S to 15109 - Insignificant emissions from 100S vessel to a liquid ring vacuum pump.
Process: ARH100N to 15109 - Insignificant emissions from the 100N vessel through a liquid ring vacuum pump.
Process: ARITFE to 15109 - Insignificant emissions from the TFE vessel through a liquid ring vacuum pump.
Process: ARJ50 HYDRO to 15106 - Insignificant emissions from the 50 Hydrolysis vessel through a mechanical vacuum pump.
Process: ARK100S to 15106 - Insignificant emissions from the 100S vessel through a mechanical vacuum pump.
Process: ARL100N to 15106 - Insignificant emissions from the 100 N vessel through a mechanical vacuum pump.
Process: ASACatayst Solution Feed Tank - Insignificant emissions from a catalyst solution feed tank.
Process: ASBSiloxane Feed Tank - Insignificant emissions from Siloxane feed tank.
Process: ASCProduct Receiver - Insignificant emissions from product receiver.
Process: ASEInsignificant emissions from Chlorosilane Charge System.
Process: ASFInsignificant emissions from the 100N vessel through a mechanical vacuum pump.
Process: ASGInsignificant emissions from the 100 N vessel through a mechanical vacuum pump.
Process: ASHInsignificant emissions from the 100S vessel through a mechanical vacuum pump.
Process: ASI100N to 15117 - Insignificant emissions from 100 gallon north vessel to mechanical vacuum pump.
Process: ASJ50 HYDRO to 15117 - Insignificant emissions from the 50 Hydrolysis vessel through a mechanical vacuum pump.
Process: ASK100S to 15117 - Insignificant emissions from mechanical vacuum pump for 100 gallon North and South Reactor.
Process: MVPTThis process consists of various mixing vessels which vent through a mechanical vacuum pump.
Process: MVTBldg. 14 Mech. Vacuum Pump - This process consists of the mechanical vacuum pump in Building 14. The pump draws vacuum for various mixing vessels in this building.
Process: MXAMixing Equipment - Atmospheric Vents - This process consists of mixing equipment

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which vents directly to the atmosphere. The equipment includes various reactors, receivers, and an elephant trunk exhaust system which collects vents from various mixing vessels.

Process: MXEMixing Vessels through ejectors - This process consists of various mixing vessels which vent through an ejector.

Process: SDCFiller/Silica Dust Collector - Elephant trunks collect filler/Silica dust while processing, and send to a dust collector.

Emission unit C62014 - This unit consists of sources in the trichlorosilanes (TCS) and fumed silica production areas. Currently, the TCS area consists of exempt sources. The fumed silica area consists of a scrubber and various solids handling equipment.

Emission unit C62014 is associated with the following emission points (EP):
68001, 68002, 68003, 68004, 68007

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

Process: FSPFumed Silica solids handling equipment. This process consists of various solids handling equipment in the fumed Silica area. The equipment includes truck unloading equipment, a vacuum bagging machine, and a product vacuum cleaner.

Process: FSSFumed Silica scrubber. This process consists of a scrubber which removes Chlorine, Hydrogen Chloride, and Particulates.

Process: GPA is located at Building 68 - Fumed silica. Insignificant emissions from Propylene Glycol surge tank.

Emission unit T13004 - Vapors and particulates are vented to the atmosphere outside of building 13 at different emissions points. These include process, filter, and local extraction discharges.

Emission unit T13004 is associated with the following emission points (EP):
13004, 13005, 13006, 13012

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

Process: ABAProcess development. Emissions from siloxanes passing from the compounder to the LIM after-condenser at location 4A.

Process: ABBProcess development. Insignificant emissions due to vents passing from the batching tank and stripper to the LIM after-condenser at location 4B.

Process: ACAProcess development. Insignificant emissions from the MM recovery reactor.

Process: LIMProcess development. Volatiles stripped from the LIM during compounding and cooling pass through the shared LIM after-condenser at location 4C.

Emission unit C27035 - Emission unit C-27035 is comprised of several aboveground storage tanks which are used to store acids. All of the tanks are located in the HCL Tank Farm All but one of the tanks vent to a packed tower water scrubber (EP27035). One tank vents to an eductor (EP27039) which is piped to the chemical process sewer. The eductor associated with EP27039 is not required by any applicable requirement. The emission unit also contains three locations within the tank farm which allow for scrapping of acid to the chemical process sewer.

Emission unit C27035 is associated with the following emission points (EP):
27035, 27036, 27037, 27038, 27039

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

Process: A2B is located at Ground, Building 27 - Breathing losses from A2/B2 acid tank. This process consists of the breathing losses from the A2/B2 weak acid storage tank.

Process: A2W is located at Ground, Building 27 - Working losses from A2/B2 acid tank. This process

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consists of the working losses from the A2/B2 weak acid storage tank.

Process: ATB is located at GROUND, Building 27 - Breathing losses from acid tanks. This process consists of the breathing losses from HCL storage tanks.

Process: ATW is located at ground, Building 27 - Working losses from acid tanks. This process consists of working losses from HCL storage tanks.

Process: WASOff-spec product (Hydrochloric Acid) is diluted with water and sent directly to the chemical process sewer.

Emission unit C23002 - This emission consists of emissions to the scrubber from tanks in area 23. The building 23 tank farm system is to provide storage for the products made in the MCS area.

Emission unit C23002 is associated with the following emission points (EP):

23002

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

Process: KB2Vent scrubber. Emissions from breathing losses from two storage tanks used to store Chlorosilanes.

Process: KBSVent scrubber. Emissions from working losses from two storage tanks used to store Chlorosilanes

Process: PTKVent scrubber. Emissions from three weigh tanks, seven batch kettles and a blend kettle.

Process: SGBVent scrubber. Emissions from breathing losses from 14 product storage tanks

Process: SGWVent scrubber. Emissions from working losses from 14 product storage tanks.

Process: TUOEmissions from tanker trailer/rail car unloading and loading operations.

Title V/Major Source Status

GE SILICONES WATERFORD FACILITY is subject to Title V requirements. This determination is based on the following information:

This facility is major for the following permitted emissions:

CONTAMINANT	PERMITTED EMISSION RANGE
VOC	>250 TPY
CO	>250 TPY
PM	>250 TPY
PM-10	>250 TPY
SO2	>250 TPY
NOx	>250 TPY
SPECIATED HAPS	
BENZENE	>10 TPY
CHLORINE	>10 TPY
COBALT	>10 TPY
1,1,1-TRICHLOROETHANE	>10 TPY
ETHYLBENZENE	>10 TPY
HEXANE	>10 TPY
HYDROGEN CHLORIDE	>10 TPY
METHYL ALCOHOL	>10 TPY
METHYL CHLORIDE	>10 TPY

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TOLUENE >10 TPY
 XYLENE >10 TPY
 TOTAL HAPS >250 TPY

Program Applicability

The following chart summarizes the applicability of GE SILICONES WATERFORD FACILITY with regards to the principal air pollution regulatory programs:

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

NOTES:

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

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

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

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

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

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

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

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

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

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating

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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
2819	INDUSTRIAL INORGANIC CHEMICALS
2821	PLASTICS MATERIALS AND RESINS
2822	SYNTHETIC RUBBER
2869	INDUSTRIAL ORGANIC CHEMICALS, NEC

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
4-04-004-97	BULK TERMINALS/PLANTS BULK TERMINALS/PLANTS FOR PETROLEUM PRODUCTS - UNDERGROUND TANKS
3-01-840-01	Specify Liquid: Breathing Loss CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Distillation Units
3-01-011-99	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - HYDROCHLORIC ACID Other Not Classified
3-01-070-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL MANUFACTURING (GENERAL) Fugitive Leaks
3-01-070-02	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL MANUFACTURING (GENERAL) Storage/Transfer
3-01-870-33	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL STORAGE (FIXED ROOF TANKS) HYDROCHLORIC ACID: BREATHING LOSS
3-01-870-34	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL STORAGE (FIXED ROOF TANKS) HYDROCHLORIC ACID: WORKING LOSS
3-01-870-97	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL STORAGE (FIXED ROOF TANKS) Specify Liquid: Breathing Loss
3-01-870-98	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL STORAGE (FIXED ROOF TANKS) Specify Liquid: Working Loss
3-01-999-98	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - OTHER NOT CLASSIFIED Specify in Comments Field
3-01-999-99	CHEMICAL MANUFACTURING

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CHEMICAL MANUFACTURING - OTHER NOT CLASSIFIED
Specify in Comments Field
3-01-018-47 CHEMICAL MANUFACTURING
CHEMICAL MANUFACTURING - PLASTICS PRODUCTION
Epoxy Resins
3-01-026-99 CHEMICAL MANUFACTURING
CHEMICAL MANUFACTURING - SYNTHETIC RUBBER (MANUFACTURING
ONLY)
Other Not Classified
3-01-026-30 CHEMICAL MANUFACTURING
CHEMICAL MANUFACTURING - SYNTHETIC RUBBER (MANUFACTURING
ONLY)
Silicone Rubber
3-01-820-10 CHEMICAL MANUFACTURING
CHEMICAL MANUFACTURING - WASTEWATER AGGREGATE
CHEMICAL PLANT WASTEWATER SYSTEM: CLARIFIER
3-85-001-10 COOLING TOWER
COOLING TOWER - PROCESS COOLING
OTHER NOT SPECIFIED
1-02-005-03 EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - DISTILLATE OIL
<10MMBTU/HR **
1-02-005-01 EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - DISTILLATE OIL
Grades 1 and 2 Oil
1-02-006-02 EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - NATURAL GAS
10-100 MMBtu/Hr
1-02-006-03 EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - NATURAL GAS
Less Than 10 MMBtu/Hr
1-02-006-01 EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - NATURAL GAS
Over 100 MBtu/Hr
1-02-004-01 EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - RESIDUAL OIL
Grade 6 Oil
3-90-900-03 IN-PROCESS FUEL USE
IN-PROCESS FUEL USE - FUEL STORAGE - FIXED ROOF
TANKS
DISTILLATE OIL (NO. 2): BREATHING LOSS
3-90-900-04 IN-PROCESS FUEL USE
IN-PROCESS FUEL USE - FUEL STORAGE - FIXED ROOF
TANKS
DISTILLATE OIL (NO. 2): WORKING LOSS
6-84-800-01 MACT MISCELLANEOUS PROCESSES (CHEMICALS)
MACT MISC PROCESSES (CHEMICALS) - EQUIPMENT LEAKS
EQUIPMENT LEAKS
3-05-102-99 MINERAL PRODUCTS
MINERAL PRODUCTS - BULK MATERIALS STORAGE BINS
Other Not Classified
3-99-999-94 MISCELLANEOUS MANUFACTURING INDUSTRIES
MISCELLANEOUS INDUSTRIAL PROCESSES
Other Not Classified
3-99-999-99 MISCELLANEOUS MANUFACTURING INDUSTRIES
MISCELLANEOUS INDUSTRIAL PROCESSES
SEE COMMENT **
4-07-004-01 ORGANIC CHEMICAL STORAGE
ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ACID
ANHYDRIDES
Acetic Anhydrides: Breathing Loss
4-07-004-02 ORGANIC CHEMICAL STORAGE
ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ACID

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ANHYDRIDES
Acetic Anhydrides: Working Loss
4-07-008-97 ORGANIC CHEMICAL STORAGE
ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS -
ALCOHOLS
Specify Alcohol: Breathing Loss
4-07-036-17 ORGANIC CHEMICAL STORAGE
ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS -
AROMATICS
m-Xylene: Breathing Loss
4-07-036-16 ORGANIC CHEMICAL STORAGE
ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS -
AROMATICS
Toluene: Working Loss
4-07-228-01 ORGANIC CHEMICAL STORAGE
ORGANIC CHEMICAL STORAGE - FLOATING ROOF TANKS -
KETONES
Acetone: Standing Loss
4-07-228-02 ORGANIC CHEMICAL STORAGE
ORGANIC CHEMICAL STORAGE - FLOATING ROOF TANKS -
KETONES
Acetone: Withdrawal Loss
4-07-999-97 ORGANIC CHEMICAL STORAGE
ORGANIC CHEMICAL STORAGE - MISCELLANEOUS
Specify in Comments
4-07-999-98 ORGANIC CHEMICAL STORAGE
ORGANIC CHEMICAL STORAGE - MISCELLANEOUS
Specify in Comments
4-01-002-98 ORGANIC SOLVENT EVAPORATION
ORGANIC SOLVENT EVAPORATION - DEGREASING
OTHER NOT CLASSIFIED - CONVEYORIZED VAPOR DEGREASING
4-01-002-99 ORGANIC SOLVENT EVAPORATION
ORGANIC SOLVENT EVAPORATION - DEGREASING
OTHER NOT CLASSIFIED - OPEN-TOP VAPOR DEGREASING
4-90-001-99 ORGANIC SOLVENT EVAPORATION
ORGANIC SOLVENT EVAPORATION - SOLVENT EXTRACTION
PROCESS
Other Not Classified
4-90-002-06 ORGANIC SOLVENT EVAPORATION
ORGANIC SOLVENT EVAPORATION WASTE SOLVENT RECOVERY
OPERATIONS
Fugitive Leaks
5-03-007-01 SOLID WASTE DISPOSAL - INDUSTRIAL
SOLID WASTE DISPOSAL: INDUSTRIAL - LIQUID WASTE
General

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is

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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
000075-65-0	2-METHYL-2-PROPANOL	> 0	but < 2.5 tpy
000092-52-4	1, 1 BIPHENYL (HAP)	> 0	but < 10 tpy
000079-34-5	1,1,2,2-TETRACHLOROETHANE (HAP)	> 0	but < 10 tpy
000057-14-7	1,1-DIMETHYL HYDRAZINE (HAP)	> 0	but < 10 tpy
000120-82-1	1,2,4-TRICHLOROBENZENE (HAP)	> 0	but < 10 tpy
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER (HAP)	> 0	but < 10 tpy
000120-80-9	1,2-BENZENEDIOL (HAP)	> 0	but < 10 tpy
000107-06-2	1,2-DICHLOROETHANE (HAP)	> 0	but < 10 tpy
000107-21-1	1,2-ETHANEDIOL (HAP)	> 0	but < 10 tpy
000108-38-3	1,3-DIMETHYL BENZENE (HAP)	> 0	but < 10 tpy
000095-80-7	1,3-BENZENEDIAMINE, 4-METHYL- (HAP)	> 0	but < 10 tpy
000106-99-0	1,3-BUTADIENE (HAP)	> 0	but < 10 tpy
000126-99-8	1,3-BUTADIENE, 2-CHLORO- (HAP)	> 0	but < 10 tpy
000085-44-9	1,3-ISOBENZOFURANDIONE (HAP)	> 0	but < 10 tpy
000123-31-9	1,4-BENZENEDIOL (HAP)	> 0	but < 10 tpy
000123-91-1	1,4-DIETHYLENE DIOXIDE (HAP)	> 0	but < 10 tpy
000098-86-2	1-PHENYLETHANONE (HAP)	> 0	but < 10 tpy
000542-75-6	1-PROPENE, 1,3-DICHLORO- (HAP)	> 0	but < 10 tpy
000121-14-2	2,4, DINITRO TOLUENE (HAP)	> 0	but < 10 tpy
000051-28-5	2,4, DINITROPHENOL (HAP)	> 0	but < 10 tpy
000088-06-2	2,4,6 TRICHLOROPHENOL (HAP)	> 0	but < 10 tpy
000108-31-6	2,5 - FURANDIONE (HAP)	> 0	but < 10 tpy
000053-96-3	2-ACETYLAMINOFLUORENE (HAP)	> 0	but < 10 tpy
000078-59-1	2-CYCLOHEXEN-1-ONE, 3,5,5-TRIMETHYL (HAP)	> 0	but < 10 tpy
000095-48-7	2-METHYL-PHENOL (HAP)	> 0	but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL (HAP)	> 0	but < 10 tpy
000079-10-7	2-PROPENOIC ACID (HAP)	> 0	but < 10 tpy
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER (HAP)	> 0	but < 10 tpy
000119-90-4	3,3'-DIMETHOXYBENZIDINE (HAP)	> 0	but < 10 tpy
000107-05-1	3-CHLORO-1-PROPENE (HAP)	> 0	but < 10 tpy
000101-77-9	4,4'-DIAMINODIPHENYLMETHANE (HAP)	> 0	but < 10 tpy
000101-14-4	4,4-METHYLENE BIS(2-CHLOROANILINE) (HAP)	> 0	but < 10 tpy
0NY502-00-0	40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)	=	250 tpy
000060-11-7	4-DIMETHYLAMINOAZOBENZENE (HAP)	> 0	but < 10 tpy
000092-93-3	4-NITROBIPHENYL (HAP)	> 0	but < 10 tpy
000075-07-0	ACETALDEHYDE (HAP)	> 0	but < 10 tpy
000060-35-5	ACETAMIDE (HAP)	> 0	but < 10 tpy
000064-19-7	ACETIC ACID	=	250 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER (HAP)	> 0	but < 10 tpy

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000079-11-8	ACETIC ACID, CHLORO (HAP)	> 0 but < 10 tpy
000075-05-8	ACETONITRILE (HAP)	> 0 but < 10 tpy
000075-36-5	ACETYL CHLORIDE	>= 250 tpy
000107-02-8	ACROLEIN (HAP)	> 0 but < 10 tpy
000532-27-4	ALPHA-CHLOROACETOPHENONE (HAP)	> 0 but < 10 tpy
007664-41-7	AMMONIA	>= 250 tpy
000062-53-3	ANILINE (HAP)	> 0 but < 10 tpy
007440-36-0	ANTIMONY (HAP)	> 0 but < 10 tpy
007440-38-2	ARSENIC (HAP)	> 0 but < 10 tpy
001332-21-4	ASBESTOS (HAP)	> 0 but < 10 tpy
000075-55-8	AZIRIDINE, 2-METHYL (HAP)	> 0 but < 10 tpy
000090-04-0	BENZENAMINE, 2-METHOXY (HAP)	> 0 but < 10 tpy
000095-53-4	BENZENAMINE, 2-METHYL (HAP)	> 0 but < 10 tpy
000121-69-7	BENZENAMINE, N, N-DIMETHYL (HAP)	> 0 but < 10 tpy
000071-43-2	BENZENE (HAP)	>= 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL) (HAP)	> 0 but < 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO- (HAP)	> 0 but < 10 tpy
000584-84-9	BENZENE, 2,4-DIISO CYANATO-1-METHYL- (HAP)	> 0 but < 10 tpy
000098-07-7	BENZENE, TRICHLOROMETHYL (HAP)	> 0 but < 10 tpy
000095-47-6	BENZENE, 1,2-DIMETHYL (HAP)	> 0 but < 10 tpy
000092-87-5	BENZIDINE (HAP)	> 0 but < 10 tpy
000100-44-7	BENZYL CHLORIDE (HAP)	> 0 but < 10 tpy
007440-41-7	BERYLLIUM (HAP)	> 0 but < 10 tpy
000057-57-8	BETA-PROPIOLACTONE (HAP)	> 0 but < 10 tpy
000117-81-7	BIS (2-ETHYLHEXYL) PHTHALATE (HAP)	> 0 but < 10 tpy
000075-25-2	BROMOFORM (HAP)	> 0 but < 10 tpy
007440-43-9	CADMIUM (HAP)	> 0 but < 10 tpy
000133-06-2	CAPTAN (HAP)	> 0 but < 10 tpy
000051-79-6	CARBAMIC ACID, ETHY ESTER (HAP)	> 0 but < 10 tpy
000079-44-7	CARBAMIC CHLORIDE, DIMETHYL (HAP)	> 0 but < 10 tpy
000075-15-0	CARBON DISULFIDE (HAP)	> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 250 tpy
000056-23-5	CARBON TETRACHLORIDE (HAP)	> 0 but < 10 tpy
000463-58-1	CARBONYL SULFIDE (HAP)	> 0 but < 10 tpy
000133-90-4	CHLORAMBEN (HAP)	> 0 but < 10 tpy
007782-50-5	CHLORINE (HAP)	>= 10 tpy
000108-90-7	CHLOROBENZENE (HAP)	> 0 but < 10 tpy
000067-66-3	CHLOROFORM (HAP)	> 0 but < 10 tpy
007738-94-5	CHROMIC ACID (HAP)	> 0 but < 10 tpy
007440-47-3	CHROMIUM (HAP)	> 0 but < 10 tpy
007440-48-4	COBALT (HAP)	>= 10 tpy
000091-44-1	COUMARIN, 7- (DIETHYLAMINO) -4-METHYL-	>= 2.5 tpy but < 10 tpy
001319-77-3	CRESYLIC ACID (HAP)	> 0 but < 10 tpy
000156-62-7	CYANAMIDE, CALCIUM SALT (1:1) (HAP)	> 0 but < 10 tpy
000057-12-5	CYANIDE (HAP)	> 0 but < 10 tpy
000334-88-3	DIAZOMETHANE (HAP)	> 0 but < 10 tpy
000132-64-9	DIBENZOFURAN (HAP)	> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE (HAP)	> 0 but < 10 tpy
000131-11-3	DIMETHYL PHTHALATE (HAP)	> 0 but < 10 tpy
000067-64-1	DIMETHYL KETONE	>= 250 tpy
000075-78-5	DIMETHYLDICHLOROSILANE C2H6CL2SI	> 0 but < 2.5 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO (HAP)	>= 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO (HAP)	> 0 but < 10 tpy
000075-34-3	ETHANE, 1,1-DICHLORO- (HAP)	> 0 but < 10 tpy
000111-44-4	ETHANE, 1,1'-OXYBIS	> 0 but < 10 tpy

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	2-CHLORO (HAP)	
000106-93-4	ETHANE, 1,2-DIBROMO (HAP)	> 0 but < 10 tpy
000075-00-3	ETHANE, CHLORO (HAP)	> 0 but < 10 tpy
000067-72-1	ETHANE, HEXACHLORO (HAP)	> 0 but < 10 tpy
000111-42-2	ETHANOL, 2,2'-IMINOBIS- (HAP)	> 0 but < 10 tpy
000110-80-5	ETHANOL, 2-ETHOXY- (HAP)	> 0 but < 10 tpy
000075-35-4	ETHENE, 1,1-DICHLORO (HAP)	> 0 but < 10 tpy
000510-15-6	ETHYL 4,4'-DICHLOROBENZILATE (HAP)	> 0 but < 10 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)	>= 250 tpy
000106-88-7	ETHYL OXIRANE (HAP)	> 0 but < 10 tpy
000100-41-4	ETHYLENE (HAP)	>= 10 tpy
000079-06-1	ETHYLENE CARBOXAMIDE (HAP)	> 0 but < 10 tpy
000075-21-8	ETHYLENE OXIDE (HAP)	> 0 but < 10 tpy
000096-45-7	ETHYLENE THIOUREA (HAP)	> 0 but < 10 tpy
000151-56-4	ETHYLENEIMINE (HAP)	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	> 0 but < 10 tpy
000068-12-2	FORMAMIDE, N,N-DIMETHYL (HAP)	> 0 but < 10 tpy
000100-00-0	HAP	>= 250 tpy
000076-44-8	HEPTACHLOR (HAP)	> 0 but < 10 tpy
000118-74-1	HEXACHLOROBENZENE (HAP)	> 0 but < 10 tpy
000087-68-3	HEXACHLOROBUTADIENE (HAP)	> 0 but < 10 tpy
000077-47-4	HEXACHLOROCYCLOPENTADIENE (HAP)	> 0 but < 10 tpy
000541-05-9	HEXAMETHYLCYCLOTRISILOXANE	>= 250 tpy
000999-97-3	HEXAMETHYLDISILAZANE	>= 250 tpy
000107-46-0	HEXAMETHYLDISILOXANE	>= 250 tpy
000110-54-3	HEXANE (HAP)	>= 10 tpy
000822-06-0	HEXANE, 1,6-DIISOCYANATO- (HAP)	> 0 but < 10 tpy
000302-01-2	HYDRAZINE (HAP)	> 0 but < 10 tpy
001333-74-0	HYDROGEN	>= 250 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)	>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE (HAP)	> 0 but < 10 tpy
000122-66-7	HYRAZINE, 1,2 - DIPHENYL (HAP)	> 0 but < 10 tpy
000067-63-0	ISOPROPYL ALCOHOL	>= 250 tpy
007439-92-1	LEAD (HAP)	> 0 but < 10 tpy
001309-60-0	LEAD DIOXIDE (HAP)	> 0 but < 10 tpy
007439-96-5	MANGANESE (HAP)	> 0 but < 10 tpy
007439-97-6	MERCURY (HAP)	> 0 but < 10 tpy
000062-75-9	METHANAMINE, N-METHYL-N-NITROSO (HAP)	> 0 but < 10 tpy
000542-88-1	METHANE, OXYBIS (CHLORO) (HAP)	> 0 but < 10 tpy
000072-43-5	METHOXYCHLOR (HAP)	> 0 but < 10 tpy
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER (HAP)	> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL (HAP)	>= 10 tpy
000074-83-9	METHYL BROMIDE (HAP)	> 0 but < 10 tpy
000074-87-3	METHYL CHLORIDE (HAP)	>= 10 tpy
000107-30-2	METHYL CHLOROMETHYLETHER (HAP)	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE (HAP)	> 0 but < 10 tpy
000060-34-4	METHYL HYDRAZINE (HAP)	> 0 but < 10 tpy
000074-88-4	METHYL IODIDE (HAP)	> 0 but < 10 tpy
000624-83-9	METHYL ISOCYANATE (HAP)	> 0 but < 10 tpy
001634-04-4	METHYL TERTBUTYL ETHER (HAP)	> 0 but < 10 tpy
000101-68-8	METHYLENE BISPHENYL ISOCYANATE (HAP)	> 0 but < 10 tpy
000075-79-6	METHYLTRICHLOROSILANE CH3CI3SI	>= 250 tpy
001185-55-3	METHYLTRIMETHOXYSILANE C4H12O3SI	>= 250 tpy
000121-44-8	N,N-DIETHYL ETHANAMINE (HAP)	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE (HAP)	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)	> 0 but < 10 tpy

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000098-95-3	NITROBENZENE (HAP)	> 0 but < 10 tpy
010102-44-0	NITROGEN DIOXIDE	>= 250 tpy
000059-89-2	NITROSOMORPHOLINE (HAP)	> 0 but < 10 tpy
000684-93-5	NITROSO-N-METHYLUREA (HAP)	> 0 but < 10 tpy
000556-67-2	OCTAMETHYLCYCLOTETRA SILOXANE	>= 250 tpy
000119-93-7	O-TOLIDINE (HAP)	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy
000106-89-8	OXIRANE, (CHLOROMETHYL) (HAP)	> 0 but < 10 tpy
000092-67-1	P-AMINODIPHENYL (HAP)	> 0 but < 10 tpy
000100-02-7	PARA-NITROPHENOL (HAP)	> 0 but < 10 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy
000082-68-8	PENTACHLORONITROBENZENE (HAP)	> 0 but < 10 tpy
000540-84-1	PENTANE, 2,2,4-TRIMETHYL- (HAP)	> 0 but < 10 tpy
000127-18-4	PERCHLOROETHYLENE (HAP)	> 0 but < 10 tpy
000108-95-2	PHENOL (HAP)	> 0 but < 10 tpy
000534-52-1	PHENOL, 2-METHYL-4,6-DINITRO (HAP)	> 0 but < 10 tpy
000108-39-4	PHENOL, 3-METHYL (HAP)	> 0 but < 10 tpy
000106-44-5	PHENOL, 4-METHYL (HAP)	> 0 but < 10 tpy
000087-86-5	PHENOL, PENTACHLORO (HAP)	> 0 but < 10 tpy
007803-51-2	PHOSPHINE (HAP)	> 0 but < 10 tpy
000062-73-7	PHOSPHORIC ACID, 2,2-DICHLOROETHENYL DIMETHYL ESTER (HAP)	> 0 but < 10 tpy
000680-31-9	PHOSPHORIC TRIAMIDE, HEXAMETHYL (HAP)	> 0 but < 10 tpy
007723-14-0	PHOSPHORUS (YELLOW) (HAP)	> 0 but < 10 tpy
0NY075-00-5	PM-10	>= 250 tpy
001336-36-3	POLYCHLORINATED BIPHENYL (HAP)	> 0 but < 10 tpy
000106-50-3	P-PHENYLENEDIAMINE (HAP)	> 0 but < 10 tpy
001120-71-4	PROPANE SULTONE (HAP)	> 0 but < 10 tpy
000096-12-8	PROPANE, 1,2-DIBROMO-3-CHLORO (HAP)	> 0 but < 10 tpy
000078-87-5	PROPANE, 1,2-DICHLORO (HAP)	> 0 but < 10 tpy
000075-56-9	PROPANE, 1,2-EPOXY- (HAP)	> 0 but < 10 tpy
000079-46-9	PROPANE, 2-NITRO (HAP)	> 0 but < 10 tpy
000107-13-1	PROPENITRILE (HAP)	> 0 but < 10 tpy
000123-38-6	PROPIONALDEHYDE (HAP)	> 0 but < 10 tpy
000091-22-5	QUINOLINE (HAP)	> 0 but < 10 tpy
000106-51-4	QUINONE (HAP)	> 0 but < 10 tpy
010043-92-2	RADON (HAP)	> 0 but < 10 tpy
007782-49-2	SELENIUM (HAP)	> 0 but < 10 tpy
068479-14-1	SILANE, CHLORO METHYL DERIVS	>= 250 tpy
001719-58-0	SILANE, CHLOROETHENYLDIMETHYL	> 0 but < 2.5 tpy
000124-70-9	SILANE, DICHLOROETHENYLMETHYL	> 0 but < 2.5 tpy
001112-39-6	SILANE, DIMETHOXYDIMETHYL	> 0 but < 2.5 tpy
000075-94-5	SILANE, TRICHLOROETHENYL C2H3CL3SI	> 0 but < 2.5 tpy
000993-07-7	SILANE, TRIMETHYL-	>= 250 tpy
001066-35-9	SILANE, CHLORODIMETHYL C2H7CLSI	> 0 but < 2.5 tpy
063148-62-9	SILOXANES AND SILICONES,DI-ME	>= 250 tpy
000100-42-5	STYRENE (HAP)	> 0 but < 10 tpy
000096-09-3	STYRENE OXIDE (HAP)	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy
000064-67-5	SULFURIC ACID, DIETHYL ESTER (HAP)	> 0 but < 10 tpy
000077-78-1	SULFURIC ACID, DIMETHYL ESTER (HAP)	> 0 but < 10 tpy
010026-04-7	TETRACHLORO SILANE	> 0 but < 2.5 tpy
007550-45-0	TITANIUM TETRACHLORIDE (HAP)	> 0 but < 10 tpy
000108-88-3	TOLUENE (HAP)	>= 10 tpy
000079-01-6	TRICHLOROETHYLENE (HAP)	> 0 but < 10 tpy

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000095-95-4	TRICHLOROPHENOL, 2,4,5 (HAP)	> 0 but < 10 tpy
000593-60-2	VINYL BROMIDE (HAP)	> 0 but < 10 tpy
000075-01-4	VINYL CHLORIDE (HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 250 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	>= 10 tpy
000106-42-3	XYLENE, PARA- (HAP)	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Sealing - 6NYCRR Part 200.5

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

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

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

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

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

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

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

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

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

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

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

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

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contained in any applicable requirement.

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

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

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

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility

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which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

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

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

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

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

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

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

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

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

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with

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copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

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iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

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

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

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item AA: Open Fires - 6 NYCRR Part 215

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

Item BB: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof

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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 CC: Federally Enforceable Requirements - 40 CFR 70.6(b)

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	1-36
FACILITY	40CFR 52-A.21	Prevention of Significant Deterioration	3-4, 3-6, 3-10, 3-11, 3-15, 3-16, 3-17, 3-18 279
U-28002/-/18O	40CFR 60-A.11	General provisions - compliance with standards and maintenance requirements	261
U-28002/-/18G	40CFR 60-A.11 (d)	General provisions - compliance with standards and maintenance requirements	280
U-28002/-/18O	40CFR 60-A.11 (d)	General provisions - compliance with standards and maintenance requirements	262
U-28002/-/18G	40CFR 60-A.12	General provisions - Circumvention	281
U-28002/-/18O	40CFR 60-A.12	General provisions - Circumvention	263
U-28002/-/18G	40CFR 60-A.13 (a)	General provisions - Monitoring requirements	282
U-28002/-/18O	40CFR 60-A.13 (a)	General provisions - Monitoring requirements	264
U-28002/-/18G	40CFR 60-A.13 (d)	General provisions - Monitoring requirements	283
U-28002/-/18O	40CFR 60-A.13 (d)	General provisions - Monitoring requirements	265
U-28002/-/18G	40CFR 60-A.13 (e)	General provisions - Monitoring requirements	284
U-28002/-/18O	40CFR 60-A.13 (e)	General provisions - Monitoring requirements	266
U-28002/-/18G	40CFR 60-A.13 (h)	General provisions - Monitoring requirements	285
U-28002/-/18O	40CFR 60-A.13 (h)	General provisions - Monitoring requirements	63
FACILITY	40CFR 60-A.4	General provisions - Address	256
U-28002/-/18G	40CFR 60-A.7 (a)	Notification and Recordkeeping	274
U-28002/-/18O	40CFR 60-A.7 (a)	Notification and Recordkeeping	257
U-28002/-/18G	40CFR 60-A.7 (b)	Notification and Recordkeeping	275
U-28002/-/18O	40CFR 60-A.7 (b)	Notification and Recordkeeping	

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U-28002/-/18G	40CFR 60-A.7(c)	Recordkeeping Notification and Recordkeeping	258
U-28002/-/18O	40CFR 60-A.7(c)	Notification and Recordkeeping	276
U-28002/-/18G	40CFR 60-A.7(d)	Notification and Recordkeeping	259
U-28002/-/18O	40CFR 60-A.7(d)	Notification and Recordkeeping	277
U-28002/-/18G	40CFR 60-A.7(f)	Notification and Recordkeeping	260
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Applicability Discussion:

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

ECL 19-301.

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

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements

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

6NYCRR Part 201-6

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

6NYCRR Part 201-6.5(c)

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

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

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

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

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and 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 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

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address where the reports are to be sent.

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-.2

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

40 CFR Part 68.

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

Facility Specific Requirements

In addition to Title V, GE SILICONES WATERFORD FACILITY has been determined to be subject to the following regulations:

40CFR 52-A.21

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

40CFR 60-A.11

Specifies opacity monitoring requirements in relation to compliance with standards and maintenance requirements.

40CFR 60-A.11 (d)

Specifies opacity monitoring requirements in relation to compliance with standards and maintenance requirements.

40CFR 60-A.12

Prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40CFR 60-A.13 (a)

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Specifies that all NSPS affected sources required to have continuous monitoring systems (CMS) are subject to the requirements of Appendix B and if the CMS is used to demonstrate compliance with emission limits on a continuous basis, then it is also subject to Appendix F.

40CFR 60-A.13 (d)

Requirements for daily drift testing for continuous monitoring systems required by this Part.

40CFR 60-A.13 (e)

Specifies minimum frequency of operation requirements for continuous monitoring systems required by this Part.

40CFR 60-A.13 (h)

Specifies data averaging requirements for continuous monitoring systems subject to this Part.

40CFR 60-A.4

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-A.7 (a)

Any owner or operator subject to this part shall furnish the Administrator notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40CFR 60-A.7 (b)

This requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40CFR 60-A.7 (c)

This requirement details the information to be submitted in excess emissions and monitoring systems performance reports which must be submitted at least semi-annually for sources with compliance monitoring systems.

40CFR 60-A.7 (d)

This specifies the required content and format for a summary report form and details when either a summary form and/or excess emissions reports are required.

40CFR 60-A.7 (f)

This specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40CFR 60-A.8 (a)

Requirements for the completion date and reporting of Performance Testing.

40CFR 60-A.8 (b)

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Requirements for Performance test methods and procedures.

40CFR 60-A.8 (c)

Requirements for operating conditions during Performance testing.

40CFR 60-A.8 (d)

Requirements for advance notification of Performance testing.

40CFR 60-A.8 (e)

Requires the facility to provide appropriate sampling ports, safe platforms and utilities as necessary for Performance testing.

40CFR 60-A.8 (f)

Requires that Performance tests consist of three runs unless otherwise specified and specifies allowable averaging of the results.

40CFR 60-Db.43b (f)

Specifies maximum allowable opacity for affected affected sources.

40CFR 60-Db.43b (g)

Specifies that the particulate matter and opacity standards apply at all times, except during periods of startup, shutdown or malfunction.

40CFR 60-Db.44b (a) (1)

These standards apply to all boilers firing natural gas and/or distillate oil except as provided in 40 CFR 60.44b(a)(4) Duct Burners Used in a Comdined Cycle System.

40CFR 60-Db.44b (h)

Specifies that the NSPS nitrogen oxide standards apply at all time including periods of startup, shutdown, or malfunction.

40CFR 60-Db.45b (j)

Specifies that owner or operators that combust very low sulfur oil are not subject to compliance and performance testing requirements for Sulfur Dioxide if they obtain fuel receipts as described in 40 CFR 60.49b(r).

40CFR 60-Db.48b (c)

The continuous monitoring system (CMS) for nitrogen oxides must be operated and data recorder during all periods of operation of the affected facility except for CMS breakdowns and repairs. Data must be recorded during calibration checks, and zero and span adjustments.

40CFR 60-Db.48b (f)

Requires standby methods of obtaining minimum emissions data for oxides of nitrogen as specified.

40CFR 60-Db.49b (f)

Records of opacity measurements made by the monitoring system required under 40CFR60.48b(a) must be kept.

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40CFR 60-Db.49b (g)

Specific minimum record keeping requirements for affected facilities with nitrogen oxide emission limits.

40CFR 60-Db.49b (r)

Specifies that owner or operators that combust very low sulfur oil are required to obtain fuel receipts. The oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Reports shall be submitted to the Administrator certifying that only very low sulfur oil meeting this definition was combusted.

40CFR 60-Kb.112b (a) (3)

This regulation requires owner or operators of storage vessels with the dimensions listed below, to install a closed vent system and control device to collect all volatile organic compounds that are discharged from the vessel. This requirement applies to storage vessels with the following dimensions: design capacity \geq 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure \geq 5.2 kPa but $<$ 76.6 kPa or with a design capacity \geq 75 m³ but $<$ 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure \geq 27.6 kPa but less than 76.7 kPa. The emissions from the storage vessel must be monitored and be less than 500 parts per million.

40CFR 60-Kb.113b (c)

Affected sources are exempt from Subpart A-60.8 testing requirements and must submit, and follow, an operation plan which is to be submitted for approval by the Administrator.

40CFR 60-Kb.115b (c)

The owner or operator shall keep a copy of the operating plan required for 40 CFR 60-Kb.113b(c) and the measured values of parameters monitored in accordance with this plan.

40CFR 60-Kb.116b (b)

Owners or operators of affected storage tanks with capacities greater than or equal to 10,000 gallons must keep records of the tanks dimensions and an analysis of its capacity for the life of the tank. If the tank's capacity is less than 20,000 gallons, then it is subject to no other provisions of this subpart.

40CFR 60-NNN.662 (a)

This options requires SOCFMI distillation operations to reduce emissions of Total organic carbon by 98% or to less than 20 ppmv, whichever is more stringent. If a boiler or process heater is used to comply with this paragraph, then the vent stream shall be introduced into the flame zone of the boiler or process heater.

40CFR 60-NNN.663 (a)

This requirement specifies installation, calibration, maintenance and operation requirements for facilities that use incinerators to comply with the total organic carbon emissions limits for SOCFMI distillation operations.

40CFR 60-NNN.665

This citation specifies record keeping and reporting requirements for SOCFMI distillation operations as follows:

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The permittee must notify the Administrator as to which provisions of 60.662 the owner opr operator has elected to comply.

The permittee must keep records of data measured during each performance test and include the data in the report of the initial performance test.

The permittee must kee continuous records of the equipment operating paramters specified to be monitored under 60.663 (a) and (c) as well as records of periods of operation during which established parameter boundaries are exceeded.

The permittee must submit semiannual reports of recorded information.

40CFR 60-RRR.702 (a)

The permittee shall reduce emissions of total organic carbon by 98% or to a concentration of 20 ppmv, whichever is less stringent. For any future performance test, the permittee must follow the methods and procedures in 40 CFR 60.704 as appropriate. For the purpose of demonstrating compliance with 60.702, all affected facilities shall be run at full operating conditions and flow rates during any performance test. Continuing compliance will be determined by monitoring vent stream flow anb boiler/process heater temperature per 40 CFR 60.703(c).

40CFR 60-RRR.703 (c)

This citation includes specifications for the required installation, calibration, maintainance and operation of a flow indicator that provides a record of vent stream flow to the boiler or process heater. It also includes specifications forthe installation, calibration, maintainance and operation for a temperature monitoring device in the firebox for boilers or process heater of less than 150 million Btu/hr.

40CFR 60-RRR.705 (r)

Each reactor process vent stream which is routed to a distillaiton unit subject to Subpart NNN and has no other releases to the air except for a pressure relief valve, is exempt from all provisions of Subpart NNN except 60.705(r) and must submit to the administrator a process design description as part of the initial report. No other records or reports would be required unless process changes are made.

40CFR 63-EEE.1206

Sources subject to this subpart (National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors) must comply with the standards of this subpart no later than September 30, 2002 unless the Administrator grants an extension of time under 63.6(i) or 63.1213 or you comply with the requirements of paragraph (a)(2) of this section for sources that do not intend to comply with the emission standards.

40CFR 63-F.102 (a)

The provisions of 40 CFR 63 Subparts F and G apply to the SOCFMI at all times except during periods of start-up, shutdown, malfunction, or non-operation of the chemical manufacturing process unit. During these periods, measures must be implemented to prevent or minimize emissions and these measures must be included in the applicable start-up, shutdown and malfunction plan.

40CFR 63-F.102 (a) (2)

The provisions set forth in subpart H, "General standards" for SOCFMI shall apply at all times except

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during periods of startup, shutdown, malfunction, process unit shutdown, or non-operation of the chemical manufacturing process unit in which the lines are drained and depressurized resulting in cessation of the emissions to which subpart H would apply.

40CFR 63-F.104

This section "Heat exchange system requirements" for the SOCFMI includes exceptions to monitoring and repair requirements. It specifies applicable monitoring pollutant lists, testing methods, sampling locations and reporting requirements. It also includes specific requirements for a monitoring plan and details when it must be updated.

40CFR 63-F.105

This section, "Maintenance wastewater requirements" for the SOCFMI, requires the owner or operator to prepare a description of maintenance procedures for management of waste-waters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspection, maintenance and repair. This section includes implementation and record keeping requirements.

40CFR 63-G.113

(c) Halogenated vent streams from Group 1 process vents that are combusted shall be controlled according to paragraph (c)(1) of this section.

(1) Where a combustion device is used to comply with paragraph (a)(2) of this section for a halogenated vent stream, the gas stream exiting the combustion device shall be conveyed to a halogen reduction device, such as a scrubber, before it is discharged to the atmosphere.

(i)

(ii) Where the scrubber was installed prior to December 31, 1992, it shall reduce overall emissions of hydrogen halides and halogens, as defined in § 63.111 of this subpart, by 95 percent or shall reduce the outlet mass of total hydrogen halides and halogens to less than 0.45 kilograms per hour, whichever is less stringent.

40CFR 63-G.113 (a) (2)

This allows the owner/operator to either reduce the total OHAP concentration in the vent stream by 98% by weight or to reduce the total OHAP or TOC concentration to 20 ppmv, whichever is less stringent.

40CFR 63-G.113 (b)

If a boiler or process heater is used to comply with the percent reduction requirement or concentration limit specified in paragraph (a)(2) of this section, then the vent stream shall be introduced into the flame zone of such a device.

40CFR 63-G.114

(a) (4) Where a scrubber is used with an incinerator, boiler, or process heater in the case of halogenated vent streams, for a process vent that uses a combustion device to comply with the requirements in § 63.113 (a)(1) or (a)(2) of this subpart; the following monitoring equipment is required for the scrubber.

(i) A pH monitoring device equipped with a continuous recorder shall be installed to monitor the pH of the scrubber effluent.

(ii) A flow meter equipped with a continuous recorder shall be located at the scrubber influent for liquid flow. Gas flow rate shall be determined using one of the procedures specified in paragraphs (a)(4)(ii)(A) through (C) of this section.

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(A) The owner or operator may determine gas flow rate using the design blower capacity, with appropriate adjustments for pressure drop.

(e) The owner or operator shall establish a range that indicates proper operation of the control or recovery device for each parameter monitored under paragraphs (a), (b), and (c) of this section. In order to establish the range, the information required in § 63.152(b) of this subpart shall be submitted in the Notification of Compliance Status or the operating permit application or amendment. The range may be based upon a prior performance test conducted for determining compliance with a regulation promulgated by the EPA, and the owner or operator is not required to conduct a performance test under § 63.116 of this subpart, if the prior performance test was conducted using the same methods specified in § 63.116 and either no process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process changes.

40CFR 63-G.114 (a) (1) (i)

(a) Each owner or operator of a process vent that uses a combustion device to comply with the requirements in § 63.113 (a)(1) or (a)(2) of this subpart, or that uses a recovery device or recapture device to comply with the requirements in § 63.113(a)(2) of this subpart, shall install monitoring equipment specified in paragraph (a)(1), (a)(2), (a)(3), (a)(4), or (a)(5) of this section, depending on the type of device used. All monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.

(1) Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.

(i) Where an incinerator other than a catalytic incinerator is used, a temperature monitor device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.

40CFR 63-G.114 (a) (3)

(a) Each owner or operator of a process vent that uses a combustion device to comply with the requirements in § 63.113 (a)(1) or (a)(2) of this subpart, or that uses a recovery device or recapture device to comply with the requirements in § 63.113(a)(2) of this subpart, shall install monitoring equipment specified in paragraph (a)(1), (a)(2), (a)(3), (a)(4), or (a)(5) of this section, depending on the type of device used. All monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.

(3) Where a boiler or process heater of less than 44 megawatts design heat input capacity is used, the following monitoring equipment is required: a temperature monitoring device in the firebox equipped with a continuous recorder. This requirement does not apply to gas streams that are introduced with primary fuel or are used as the primary fuel.

40CFR 63-G.114 (a) (4) (i)

(4) Where a scrubber is used with an incinerator, boiler, or process heater in the case of halogenated vent streams, the following monitoring equipment is required for the scrubber.

(i) A pH monitoring device equipped with a continuous recorder shall be installed to monitor the pH of the scrubber effluent.

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Minimum pH of 0.3 is required.

40CFR 63-G.114 (a) (4) (ii)

(4) Where a scrubber is used with an incinerator, boiler, or process heater in the case of halogenated vent streams, the following monitoring equipment is required for the scrubber.

(ii) Gas flow rate shall be determined using one of the procedures specified in paragraphs (a)(4)(ii)(A) through (C) of this section.

(A) The owner or operator may determine gas flow rate using the design blower capacity, with appropriate adjustments for pressure drop.

40CFR 63-G.119 (b)

The owner or operator who elects to use a fixed roof and an internal floating roof to comply with the requirements of paragraph (a)(1) of this section for Group 1 storage vessels storing a liquid for which the maximum true vapor pressure of the total organic hazardous air pollutants in the liquid is less than 574 mm of mercury (76.6 kilopascals) shall comply with the requirements specified in paragraphs (b)(1) through (b)(6) of this section.

40CFR 63-G.119 (e)

The owner or operator who elects to use a closed vent system and control device to comply with the requirements of paragraph (a)(1) or (a)(2) of this section for Group 1 storage vessels storing a liquid organic hazardous air pollutants shall comply with the requirements specified in paragraphs (e)(1) through (e)(5) of this section.

40CFR 63-G.123 (a)

Each owner or operator of a Group 1 or Group 2 storage vessel, as defined in Table 1 of Subpart F, shall keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept as long as the storage vessel retains Group 1 or Group 2 status and is in operation. For each Group 2 storage vessel, the owner or operator is not required to comply with any other provisions of 63.119 through 63.123 of this subpart other than those required by this paragraph unless such vessel is part of an emissions average as described in 63.150 of this subpart.

40CFR 63-G.132 (a) (3)

Requirements for Group 2 wastewater streams; the owner or operator shall keep in a readily accessible location the records specified in (i) through (iv) below and include this information in the Notification of Compliance Status Report. This information may be submitted in any form. Table 15 of this subpart is an example.

(i) Process unit identification and description of the process unit.

(ii) Stream identification code.

(iii) For existing sources, concentration of table 9 compound(s) in parts per million, by weight. For new sources, concentration of table 8 and/or table 9 compound(s) in parts per million, by weight. Include documentation of the methodology used to determine concentration.

(iv) Flow rate in liter per minute.

40CFR 63-G.146 (b) (2)

For each source subject to this provision, the owner or operator shall submit the information specified in Table 15 of this subpart for Table 8 and/or Table 9 compounds. Table 15 specifies the following

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information: Process unit identification code / Stream identification code / Concentration of table 8 and/or table 9 compound(s) (ppmw) / Flow rate (lpm) / Group 1 or Group 2 / Compliance approach / Treatment process(es) identification / Waste management unit(s) identification / intended control device.

40CFR 63-G.148 (b) (1)

If the vapor collection system or closed vent system is constructed of hard-piping, the owner or operator shall:

- (i) Conduct an initial inspection according to the procedures in paragraph (c) of this section, and
- (ii) Conduct annual visual inspections for visible, audible, or olfactory indications of leaks.

40CFR 63-G.148 (d)

Leaks, as indicated by an instrument reading greater than 500 parts per million above background or by visual inspections, shall be repaired as soon as practicable, except as provided in paragraph (e) of this section.

- (1) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
- (2) Repair shall be completed no later than 15 calendar days after the leak is detected, except as provided in paragraph (d)(3) of this section.
- (3) For leaks found in vapor collection systems used for transfer operations, repairs shall be completed no later than 15 calendar days after the leak is detected or at the beginning of the next transfer loading operation, whichever is later.

40CFR 63-G.148 (e)

Delay of repair of a vapor collection system, closed vent system, fixed roof, cover, or enclosure for which leaks have been detected is allowed if the repair is technically infeasible without a shutdown, as defined in 63.101 of subpart F of this part, or if the owner or operator determined that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next shutdown.

40CFR 63-G.148 (i)

The owner or operator shall record the information specified in paragraphs (i)(4-6).

4) For each inspection during which a leak is detected, a record of the information specified in paragraphs (i)(4)(i-viii).

- (i) The instrument identification numbers; operator name or initials; and identification of the equipment.
- (ii) The date the leak was detected and the date of the first attempt to repair the leak.
- (iii) Maximum instrument reading measured by the method specified in paragraph (d) after the leak is successfully repaired or determined to be non-repairable.
- (iv) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
- (v) The name, initials, or other form of identification of the owner or operator (or designee) whose decision it was that repair could not be effected without a shutdown.
- (vi) The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days.
- (vii) Dates of shutdowns that occur while the equipment is unrepaired.
- (viii) The date of successful repair of the leak.

5) For each inspection conducted in accordance with 40 CFR 63.147(c) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected.

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6) For each visual inspection conducted in accordance with paragraph 40CFR63.148(b)(1or3)(ii) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected.

40CFR 63-G.148 (j)

The following information shall be submitted with the reports required by 40CFR63.182(b) or 40CFR63.152(c):

- 1) The information recorded for leaks that were detected, as described in 40CFR63.148(i)(4);
- 2) Reports of the times of all periods when the vent stream is diverted from the control device through a bypass line; and
- 3) Reports of all periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line valve was checked out.

40CFR 63-G.152 (d) (1)

Reports of start-up, shutdown, and malfunction required by 63.10(d)(5) of Subpart A. The start-up, shutdown and malfunction reports may be submitted on the same schedule as the Periodic Reports required under paragraph (c) of this section instead of the schedule specified in 63.10(d)(5) of subpart A.2

40CFR 63-H.160

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

40CFR 63-H.162 (c)

Each piece of equipment in a process unit to which this subpart applies shall be identified such that it can be distinguished readily from equipment that is not subject to this subpart. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, or by designation of process unit boundaries by some form of weatherproof identification.

40CFR 63-H.162 (f)

When a leak is detected, the following requirements apply:

- (1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
- (2) The identification on a valve may be removed after it has been monitored and no leak is detected during that monitoring.
- (3) The identification which has been placed on equipment determined to have a leak, except for a valve or for a connector that has been opened or has otherwise had the seal broke and is subject to the provisions of 63.174(c)(1)(i), may be removed after it is repaired.

40CFR 63-H.163 (a)

The provisions of this section apply to each pump that is in light liquid service.

- (1) The provisions are to be implemented on the dates specified in the specific subpart in 40 CFR part 63 that references this subpart in the phases specified below:
 - (i) For each group of existing process units at existing sources subject to the provisions of subparts F or I of this part, the phases of the standard are:

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- (A) Phase I, beginning on the compliance date;
 - (B) Phase II, beginning no later than 1 year after the compliance date; and
 - (C) Phase III, beginning no later than 2\1/2\ years after the compliance date.
- (ii) For new sources subject to the provisions of subparts F or I of this part, the applicable phases of the standard are:
- (A) After initial start-up, comply with the Phase II requirements; and
 - (B) Beginning no later than 1 year after initial start-up, comply with the Phase III requirements.
- (2) The owner or operator of a source subject to the provisions of subparts F or I of this part may elect to meet the requirements of a later phase during the time period specified for an earlier phase.
- (3) Sources subject to other subparts in 40 CFR part 63 that reference this subpart shall comply on the dates specified in the applicable subpart.

40CFR 63-H.163 (b) (1)

The owner or operator of a process unit subject to this subpart shall monitor each pump monthly to detect leaks by the method specified in Sec. 63.180(b) of this subpart and shall comply with the requirements of paragraphs (a) through (d) of this section, except as provided in Sec. 63.162(b) of this subpart and paragraphs (e) through (j) of this section.

40CFR 63-H.163 (b) (2)

The instrument reading, as determined by the method as specified in 63.180(b) of this subpart, that defined a leak in each phase of the standard is:

- (i) For Phase I (beginning on the compliance date), an instrument reading of 10,000 parts per million or greater.
- (ii) For Phase II (beginning no later than 1 year after the compliance date), an instrument reading of 5,000 parts per million or greater.
- (iii) For Phase III (beginning no later than 2.5 years after the compliance date), an instrument reading of:
 - (A) 5,000 parts per million or greater for pumps handling polymerizing monomers;
 - (B) 2,000 parts per million or greater for pumps in food/medical service; and
 - (C) 1,000 parts per million or greater for all other pumps.

40CFR 63-H.163 (b) (3)

Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected.

40CFR 63-H.163 (d) (1)

The owner or operator shall decide no later than the first monitoring period whether to calculate percent leaking pumps on a process unit basis or on a source-wide basis. Once the owner or operator has decided, all subsequent percent calculations shall be made on the same basis.

40CFR 63-H.164 (i)

Any compressor that is designated, as described in 63.181(b)(2)(ii) of this subpart, to operate with an instrument reading of less than 500 parts per million above background, is exempt from the requirements of paragraphs (a) through (h) of this section if the compressor:

- (1) Is demonstrated to be operating with an instrument reading of less than 500 parts per million above background, as measured by the method specified in 63.180(c) of this subpart; and
- (2) Is tested for compliance with paragraph (i)(1) of this section initially upon designation, annually, and at

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other times requested by the Administrator.

40CFR 63-H.165 (d) (2)

After each pressure release, a rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 63.171 of this subpart.

40CFR 63-H.166

Each sampling collection system shall be equipped with a closed-purge, closed-loop, or closed-vent system. Gases displaced during filling of the sampling container are not required to be collected or captured. Each closed-purge, closed-loop, or closed-vent system shall:

- 1) return the purged process fluid directly to the process line; or
- 2) collect and recycle the purged process fluid to a process; or
- 3) be designed and operated to capture and transport the purged process fluid to a control device that complies with the requirements of 40CFR63.172; or
- 4) collect, store, and transport the purged process fluid to a system or facility identified in 40CFR63.166(b)(4)(i), (ii), or (iii).

40CFR 63-H.167 (a) (1)

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 63.162(b) of this section.

40CFR 63-H.167 (b)

Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

40CFR 63-H.167 (c)

When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with °63.167(a) at all other times.

40CFR 63-H.167 (d)

Open-ended valves and lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of °63.167(a), (b), and (c).

40CFR 63-H.168 (b)

The owner or operator of a source subject to this subpart shall monitor all valves, except as provided in 63.162(b) of this subpart and paragraphs (h) and (i) of this section, at the intervals specified in paragraphs (c) and (d) of this section and shall comply with all other provisions of this section, except as provided in 63.171, 63.177, 63.178 and 63.179 of this subpart.

- (1) The valves shall be monitored to detect leaks by the method specified in 63.180(b) of this subpart.
- (2) The instrument reading that defines a leak in each phase of the standard is:
 - (i) For Phase I (beginning on the compliance date), an instrument reading of 10,000 parts per million or greater.
 - (ii) For Phase II (beginning no later than 1 year after the compliance date), an instrument reading of 500 parts

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per million or greater.

(iii) For Phase III (beginning no later than 2.5 years after the compliance date), an instrument reading of 500 parts per million or greater.

40CFR 63-H.168 (f) (1)

When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 63.171 of this subpart.

40CFR 63-H.168 (h)

Any valve that has been designated as unsafe-to-monitor is exempt from the monitoring requirements of 40CFR63.168 if:

- 1) it is determined that monitoring personnel would be exposed to an immediate danger as a consequence of complying with the monitoring provisions; and
- 2) there is a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor periods, but not more frequently than the periodic monitoring schedule otherwise applicable.²

40CFR 63-H.168 (i)

Any valve that is designated, as described in 63.181(b)(7)(ii) of this subpart, as a difficult-to-monitor valve is exempt from the requirements of paragraphs (b)(through (d) of this section if:

- (1) The owner or operator of the valve determines that the valve cannot be monitored without elevating the monitoring personnel more than 6 feet above a support surface or it is not accessible at anytime in a safe manner;
- (2) The process unit within which the valve is located is an existing source or the owner or operator designates less than 3 percent of the total number of valves in a new source as difficult-to- monitor; and
- (3) The owner or operator of the valve follows a written plan that required monitoring of the valve at least once per calendar year.²

40CFR 63-H.171 (a)

Delays of repair of equipment for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur by the end of the next process unit shut-down.

40CFR 63-H.171 (b)

Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in organic HAP service.

40CFR 63-H.171 (c)

Delay of repair is allowed for valves, connectors, and agitators if it is determined that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair, and when repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with 40CFR63.172.

40CFR 63-H.171 (d)

Delay of repair for pumps is also allowed if:

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- (1) Repair requires replacing the existing seal design with a new system that the owner or operator has determined under the provisions of 63.176(d) if this subpart will provide better performance or:
 - (i) A dual mechanical seal system that meets the requirements of 63.163(e) of this subpart,
 - (ii) A pump that meet the requirements of 63.163(f) of this subpart, or
 - (iii) A closed-vent system and control device that meet the requirements of 63.163(g) of this subpart; and
- (2) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

40CFR 63-H.171 (e)

Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the second process unit shutdown will not be allowed unless the third process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

40CFR 63-H.174 (a)

The owner or operator of a process unit subject to this subpart shall monitor all connectors in gas/vapor and light liquid service, except as provided in 63.162(b) of this subpart, and in paragraphs (f) through (h) of this section, at the intervals specified in paragraph (b) of this section.

- (1) The connectors shall be monitored to detect leaks by the method specified in 63.180(b) of this subpart.
- (2) If an instrument reading greater than or equal to 500 parts per million is measured, a leak is detected.

40CFR 63-H.174 (c) (1) (i)

Except as provided in paragraph (c)(1)(ii) of this section, each connector that has been opened or has otherwise had the seal broke shall be monitored for leaks when it is reconnected or within the first 3 months after being returned to organic hazardous air pollutants service. If the monitoring detects a leak, it shall be repaired according to the provisions of paragraph (d) of this section unless it is determined to be non-repairable, in which case it is counted as a non-repairable connector for the purposes of paragraph (i)(2) of this section.

40CFR 63-H.174 (c) (2)

As an alternative to the monitoring requirements for connectors, each screwed connector that is 2 inches or less in nominal inside diameter may comply with 40CFR63.169 and be monitored for leaks within the first 3 months after being returned to organic HAP service after having been opened or otherwise had the seal broken. If that monitoring detects a leak, it shall be repaired according to the provisions in 40CFR63.174(d).

This applies to screwed connectors that were installed before December 31, 1992 for sources subject to Subparts F or I, or installed before the proposal date of the applicable subpart which references this provision.

40CFR 63-H.174 (f)

Any connector that is designated as unsafe-to-monitor is exempt from the monitoring requirements for connectors if it is determined that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with this section and there is a written plan that requires monitoring of the connector as frequently as practicable during safe-to-monitor periods but not more frequently than the periodic schedule otherwise applicable.

40CFR 63-H.174 (g)

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Any connector that is designated as unsafe-to-repair is exempt from the monitoring and leak repair provisions for connectors if it is determined that repair personnel would be exposed to an immediate danger as a consequence of complying with the repair provisions and the connector will be repaired before the end of the next scheduled process unit shutdown.

40CFR 63-H.174 (h) (1)

Any connector that is inaccessible or is ceramic or ceramic-lined (e.g., porcelain, glass. Or glass-lines), is exempt from the monitoring requirements of paragraphs (a) and (c) of this section and from the record keeping and reporting requirements of 63.181 and 63.182 of this subpart. An inaccessible connector is one that is:

- (i) Buried;
- (ii) Insulated in a manner that prevents access to the connector by a monitor probe;
- (iii) Obstructed by equipment or piping that prevents access to the connector by a monitor probe;
- (iv) Unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold which would allow access to connectors up to 7.6 meters (25 feet) above the ground;
- (v) Inaccessible because it would require elevating the monitoring personnel more than 10 feet above a permanent support surface or would require the erection of scaffold; or
- (vi) Not able to be accessed at any time in a safe manner to perform monitoring. Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where an ignition potential exists, or access would require near proximity to hazards such as electrical lines, or would risk damage to equipment.

40CFR 63-H.175

The Methyl Chloride plant is subject to Quality Improvement Program Requirements for Valves as detailed in Section 175 of 40 CFR 63 Subpart H.

40CFR 63-H.176

(a) In Phase III, if, on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit (or plant site) or three pumps in a process unit (or plant site) leak, the owner or operator shall comply with the requirements of this section as specified below:

- (1) Pumps that are in food/medical service or in polymerizing monomer service shall comply with all requirements except for those specified in paragraph (d)(8) of this section.
- (2) Pumps that are not in food/medical or polymerizing monomer service shall comply with all requirements of this section.

(b) The owner or operator shall comply with the requirements of this section until the number of leaking pumps is less than the greater of either 10 percent of the pumps or three pumps, calculated as a 6-month rolling average, in the process unit (or plant site). Once the performance level is achieved, the owner or operator shall comply with the requirements in Sec. 63.163 of this subpart.

(c) If in a subsequent monitoring period, the process unit (or plant site) has greater than 10 percent of the pumps leaking or three pumps leaking (calculated as a 6-month rolling average), the owner or operator shall resume the quality improvement program starting at performance trials.

(d) The quality improvement program shall include the following:

- (1) The owner or operator shall comply with the requirements in Sec. 63.163 of this subpart.
- (2) The owner or operator shall collect the following data, and maintain records as required in Sec. 63.181(h)(3), for each pump in each process unit (or plant site) subject to the quality improvement program. The data may be collected and the records may be maintained on a process unit or plant site basis.

(i) Pump type (e.g., piston, horizontal or vertical centrifugal, gear, bellows); pump manufacturer; seal type and

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manufacturer; pump design (e.g., external shaft, flanged body); materials of construction; if applicable, barrier fluid or packing material; and year installed.

(ii) Service characteristics of the stream such as discharge pressure, temperature, flow rate, corrosivity, and annual operating hours.

(iii) The maximum instrument readings observed in each monitoring observation before repair, response factor for the stream if appropriate, instrument model number, and date of the observation.

(iv) If a leak is detected, the repair methods used and the instrument readings after repair.

(v) If the data will be analyzed as part of a larger analysis program involving data from other plants or other types of process units, a description of any maintenance or quality assurance programs used in the process unit that are intended to improve emission performance.

(3) The owner or operator shall continue to collect data on the pumps as long as the process unit (or plant site) remains in the quality improvement program.

(4) The owner or operator shall inspect all pumps or pump seals which exhibited frequent seal failures and were removed from the process unit due to leaks. The inspection shall determine the probable cause of the pump seal failure or of the pump leak and shall include recommendations, as appropriate, for design changes or changes in specifications to reduce leak potential.

(5)(i) The owner or operator shall analyze the data collected to comply with the requirements of paragraph (d)(2) of this section to determine the services, operating or maintenance practices, and pump or pump seal designs or technologies that have poorer than average emission performance and those that have better than average emission performance. The analysis shall determine if specific trouble areas can be identified on the basis of service, operating conditions or maintenance practices, equipment design, or other process specific factors.

(ii) The analysis shall also be used to determine if there are superior performing pump or pump seal technologies that are applicable to the service(s), operating conditions, or pump or pump seal designs associated with poorer than average emission performance. A superior performing pump or pump seal technology is one with a leak frequency of less than 10 percent for specific applications in the process unit or plant site. A candidate superior performing pump or pump seal technology is one demonstrated or reported in the available literature or through a group study as having low emission performance and as being capable of achieving less than 10 percent leaking pumps in the process unit (or plant site).

(iii) The analysis shall include consideration of:

(A) The data obtained from the inspections of pumps and pump seals removed from the process unit due to leaks;

(B) Information from the available literature and from the experience of other plant sites that will identify pump designs or technologies and operating conditions associated with low emission performance for specific services; and

(C) Information on limitations on the service conditions for the pump seal technology operating conditions as well as information on maintenance procedures to ensure continued low emission performance.

(iv) The data analysis may be conducted through an inter- or intra- company program (or through some combination of the two approaches) and may be for a single process unit, a plant site, a company, or a group of process units.

(v) The first analysis of the data shall be completed no later than 18 months after the start of the quality improvement program. The first analysis shall be performed using a minimum of 6 months of data. An analysis of the data shall be done each year the process unit is in the quality improvement program.

(6) A trial evaluation program shall be conducted at each plant site for which the data analysis does not identify use of superior performing pump seal technology or pumps that can be applied to the areas identified as having poorer than average performance, except as provided in paragraph (d)(6)(v) of this section. The trial

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program shall be used to evaluate the feasibility of using in the process unit (or plant site) the pump designs or seal technologies, and operating and maintenance practices that have been identified by others as having low emission performance.

(i) The trial program shall include on-line trials of pump seal technologies or pump designs and operating and maintenance practices that have been identified in the available literature or in analysis by others as having the ability to perform with leak rates below 10 percent in similar services, as having low probability of failure, or as having no external actuating mechanism in contact with the process fluid. If any of the candidate superior performing pump seal technologies or pumps is not included in the performance trials, the reasons for rejecting specific technologies from consideration shall be documented as required in Sec. 63.181(h)(5)(ii).

(ii) The number of pump seal technologies or pumps in the trial evaluation program shall be the lesser of 1 percent or two pumps for programs involving single process units and the lesser of 1 percent or five pumps for programs involving a plant site or groups of process units. The minimum number of pumps or pump seal technologies in a trial program shall be one.

(iii) The trial evaluation program shall specify and include documentation of:

(A) The candidate superior performing pump seal designs or technologies to be evaluated, the stages for evaluating the identified candidate pump designs or pump seal technologies, including the time period necessary to test the applicability;

(B) The frequency of monitoring or inspection of the equipment;

(C) The range of operating conditions over which the component will be evaluated; and

(D) Conclusions regarding the emission performance and the appropriate operating conditions and services for the trial pump seal technologies or pumps.

(iv) The performance trials shall initially be conducted, at least, for a 6-month period beginning not later than 18 months after the start of the quality improvement program. No later than 24 months after the start of the quality improvement program, the owner or operator shall have identified pump seal technologies or pump designs that, combined with appropriate process, operating, and maintenance practices, operate with low emission performance for specific applications in the process unit. The owner or operator shall continue to conduct performance trials as long as no superior performing design or technology has been identified, except as provided in paragraph (d)(6)(vi) of this section. The initial list of superior emission performance pump designs or pump seal technologies shall be amended in the future, as appropriate, as additional information and experience is obtained.

(v) Any plant site with fewer than 400 valves and owned by a corporation with fewer than 100 employees shall be exempt from trial evaluations of pump seals or pump designs. Plant sites exempt from the trial evaluations of pumps shall begin the pump seal or pump replacement program at the start of the fourth year of the quality improvement program.

(vi) An owner or operator who has conducted performance trials on all alternative superior emission performance technologies suitable for the required applications in the process unit may stop conducting performance trials provided that a superior performing design or technology has been demonstrated or there are no technically feasible alternative superior technologies remaining. The owner or operator shall prepare an engineering evaluation documenting the physical, chemical, or engineering basis for the judgment that the superior emission performance technology is technically infeasible or demonstrating that it would not reduce emissions.

(7) Each owner or operator shall prepare and implement a pump quality assurance program that details purchasing specifications and maintenance procedures for all pumps and pump seals in the process unit. The quality assurance program may establish any number of categories, or classes, of pumps as needed to distinguish among operating conditions and services associated with poorer than average emission performance as well as those associated with better than average emission performance. The quality

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assurance program shall be developed considering the findings of the data analysis required under paragraph (d)(5) of this section, if applicable, the findings of the trial evaluation required in paragraph (d)(6) of this section, and the operating conditions in the process unit. The quality assurance program shall be updated each year as long as the process unit has the greater of either 10 percent or more leaking pumps or has three leaking pumps.

(i) The quality assurance program shall:

(A) Establish minimum design standards for each category of pumps or pump seal technology. The design standards shall specify known critical parameters such as tolerance, manufacturer, materials of construction, previous usage, or other applicable identified critical parameters;

(B) Require that all equipment orders specify the design standard (or minimum tolerances) for the pump or the pump seal;

(C) Provide for an audit procedure for quality control of purchased equipment to ensure conformance with purchase specifications. The audit program may be conducted by the owner or operator of the plant site or process unit or by a designated representative; and

(D) Detail off-line pump maintenance and repair procedures. These procedures shall include provisions to ensure that rebuilt or refurbished pumps and pump seals will meet the design specifications for the pump category and will operate such that emissions are minimized.

(ii) The quality assurance program shall be established no later than the start of the third year of the quality improvement program for plant sites with 400 or more valves or 100 or more employees; and no later than the start of the fourth year of the quality improvement program for plant sites with less than 400 valves and less than 100 employees.

(8) Beginning at the start of the third year of the quality improvement program for plant sites with 400 or more valves or 100 or more employees and at the start of the fourth year of the quality improvement program for plant sites with less than 400 valves and less than 100 employees, the owner or operator shall replace, as described in paragraphs (d)(8)(i) and (d)(8)(ii) of this section, the pumps or pump seals that are not superior emission performance technology with pumps or pump seals that have been identified as superior emission performance technology and that comply with the quality assurance standards for the pump category. Superior emission performance technology is that category or design of pumps or pump seals with emission performance which, when combined with appropriate process, operating, and maintenance practices, will result in less than 10 percent leaking pumps for specific applications in the process unit or plant site. Superior emission performance technology includes material or design changes to the existing pump, pump seal, seal support system, installation of multiple mechanical seals or equivalent, or pump replacement.

(i) Pumps or pump seals shall be replaced at the rate of 20 percent per year based on the total number of pumps in light liquid service. The calculated value shall be rounded to the nearest nonzero integer value. The minimum number of pumps or pump seals shall be one. Pump replacement shall continue until all pumps subject to the requirements of Sec. 63.163 of this subpart are pumps determined to be superior performance technology.

(ii) The owner or operator may delay replacement of pump seals or pumps with superior technology until the next planned process unit shutdown, provided the number of pump seals and pumps replaced is equivalent to the 20 percent or greater annual replacement rate.

(iii) The pumps shall be maintained as specified in the quality assurance program.

40CFR 63-H.180

The Methyl Chloride plant is subject to the Test Methods and Procedures as detailed in Section 180 of 40 CFR 63 Subpart H.

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40CFR 63-H.181 (a)

An owner or operator of more than one process unit subject to the provisions of this subpart may comply with the record keeping requirements for these process units in one record keeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records and information required by this section shall be maintained in a manner that can be readily accessed at the plant site. This could include physically locating the records at the plant site or accessing the records from a central location by computer at the plant site.

40CFR 63-H.181 (b)

This paragraph details the information which must be recorded for each process unit subject to the requirements on 63.162 through 63.174 of this subpart with exception as provided in paragraph (e) of this section.

40CFR 63-H.181 (c)

For visual inspections of equipment subject to the provisions of this subpart (e.g., 63.163(b)(3), 63.163(e)(4)(i), the owner or operator shall document that the inspection was conducted and the date of the inspection. The owner or operator shall maintain

40CFR 63-H.181 (d)

This paragraph details the information which must be recorded and kept for 2 years when a leak is detected.

40CFR 63-H.181 (f)

The dates and results of each compliance test required for compressors subject to the provisions in 63.164(i) and the dates and results of the monitoring following a pressure release for each pressure relief device subject to the provisions in 63.165(a) and (b) of this subpart. The results shall include:

- (1) The background level measured during each compliance test.
- (2) The maximum instrument reading measured at each piece of equipment during each compliance test.

40CFR 63-H.181 (h)

Each owner or operator of a process unit subject to the requirements of Secs. 63.175 and 63.176 of this subpart shall maintain the records specified in paragraphs (h)(1) through (h)(9) of this section for the period of the quality improvement program for the process unit.

(1) For owners or operators who elect to use a reasonable further progress quality improvement program, as specified in Sec. 63.175(d) of this subpart:

- (i) All data required in Sec. 63.175(d)(2) of this subpart.
- (ii) The percent leaking valves observed each quarter and the rolling average percent reduction observed in each quarter.
- (iii) The beginning and ending dates while meeting the requirements of Sec. 63.175(d) of this subpart.

(2) For owners or operators who elect to use a quality improvement program of technology review and improvement, as specified in Sec. 63.175(e) of this subpart:

- (i) All data required in Sec. 63.175(e)(2) of this subpart.
 - (ii) The percent leaking valves observed each quarter.
 - (iii) Documentation of all inspections conducted under the requirements of Sec. 63.175(e)(4) of this subpart, and any recommendations for design or specification changes to reduce leak frequency.
 - (iv) The beginning and ending dates while meeting the requirements of Sec. 63.175(e) of this subpart.
- (3) For owners or operators subject to the requirements of the pump quality improvement program as

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specified in Sec. 63.176 of this subpart:

- (i) All data required in Sec. 63.176(d)(2) of this subpart.
- (ii) The rolling average percent leaking pumps.
- (iii) Documentation of all inspections conducted under the requirements of Sec. 63.176(d)(4) of this subpart, and any recommendations for design or specification changes to reduce leak frequency.
- (iv) The beginning and ending dates while meeting the requirements of Sec. 63.176(d) of this subpart.
- (4) If a leak is not repaired within 15 calendar days after discovery of the leak, the reason for the delay and the expected date of successful repair.
- (5) Records of all analyses required in Secs. 63.175(e) and 63.176(d) of this subpart. The records will include the following:
 - (i) A list identifying areas associated with poorer than average performance and the associated service characteristics of the stream, the operating conditions and maintenance practices.
 - (ii) The reasons for rejecting specific candidate superior emission performing valve or pump technology from performance trials.
 - (iii) The list of candidate superior emission performing valve or pump technologies, and documentation of the performance trial program items required under Secs. 63.175(e)(6)(iii) and 63.176(d)(6)(iii) of this subpart.
 - (iv) The beginning date and duration of performance trials of each candidate superior emission performing technology.
- (6) All records documenting the quality assurance program for valves or pumps as specified in Secs. 63.175(e)(7) and 63.176(d)(7) of this subpart.
- (7) Records indicating that all valves or pumps replaced or modified during the period of the quality improvement program are in compliance with the quality assurance requirements in Sec. 63.175(e)(7) and Sec. 63.176(d)(7) of this subpart.
- (8) Records documenting compliance with the 20 percent or greater annual replacement rate for pumps as specified in Sec. 63.176(d)(8) of this subpart.

40CFR 63-H.182 (d)

The owner or operator of a source subject to this subpart shall submit Periodic Reports.

(1) A report containing the information in paragraphs (d)(2), (d)(3), and (d)(4) of this section shall be submitted semiannually starting 6 months after the Notification of Compliance Status, as required in paragraph (c) of this section. The first periodic report shall cover the first 6 months after the compliance date specified in 63.100(k)(3) of subpart F. Each subsequent periodic report shall cover the 6 month period following the preceding period.

40CFR 68

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

6NYCRR 201-6.5 (c)

This requirement specifies what information must be included in any records and reports that are to be maintained or submitted as a result of any compliance monitoring. Records of all monitoring data and support information is to be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Reports of any required monitoring as a result of a federally applicable requirement needs to be submitted every 6 months, at a minimum. Finally, the permit needs to include a notification and reporting process for permit deviations and incidences of

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noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5 (c) (2)

This requirement specifies what information must be included in any records and reports that are to be maintained or submitted as a result of any compliance monitoring. Records of all monitoring data and support information is to be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Reports of any required monitoring as a result of a federally applicable requirement needs to be submitted every 6 months, at a minimum. Finally, the permit needs to include a notification and reporting process for permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

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

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

6NYCRR 201-6.5 (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.

6NYCRR 201-7

This subpart specifies how a source owner or operator may opt to avoid being subject to one or more applicable requirements to which the source or unit would have otherwise been subject, or where needed to establish an emission reduction credit by accepting federally-enforceable permit conditions restricting or capping emissions.

6NYCRR 204-1.6

Requires that a complete NOx Budget permit application be submitted by May 1, 2002.

6NYCRR 204-2.1

NOx Budget Trading submittals must be signed and certified by the NOx Authorized Account Representative.

6NYCRR 204-4.1

Details the required information in the NOx Budget Compliance Certification Report.

6NYCRR 204-5.3

Specifies procedures for determining NOx Allowance Allocations.

6NYCRR 204-7.1

Specifies requirements for NOx Allowance Transfer submittals.

6NYCRR 204-8.1

Specifies the source for definitions of terms, and requires compliance with, NOx Budget monitoring and reporting

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requirements.

6NYCRR 204-8.2

Requires the owner/operator to determine, record and report NO_x mass, heat input (if required for purposes of allocations) and any other values required to determine NO_x mass.

6NYCRR 204-8.3

Procedures for NO_x data substitution for periods when the monitoring system fails QA requirements.

6NYCRR 204-8.6

(b) The NO_x authorized account representative of a NO_x Budget unit that is not subject to an Acid Rain emissions limitation may submit a petition under 40 CFR 75.66 to the Department and the Administrator requesting approval to apply an alternative to any requirement of this Subpart.

(1) The NO_x authorized account representative of a NO_x Budget unit that is subject to an Acid Rain emissions limitation may submit a petition under 40 CFR 75.66 to the Department and the Administrator requesting approval to apply an alternative to a requirement concerning any additional CEMS required under the common stack provisions of 40 CFR 75.72 or a NO_x concentration CEMS used under 40 CFR 75.71(a)(2).

(2) Application of an alternative to any requirement of this Subpart is in accordance with this Subpart only to the extent the petition under subdivision (b) of this section is approved by both the Department and the Administrator.

6NYCRR 204-8.7

Additional requirements to provide heat input data for allocation purposes where mass emissions are determined from concentration and flow systems.

6NYCRR 212

Part 212 incorporates requirements for emissions from General Process Sources.

6NYCRR 212 .10 (a) (2)

Reasonably Available Control Technology (RACT) is required for sources of volatile organic compounds (VOC) and oxides of nitrogen (NO_x) at this facility as specified in this Section of Part 212.

6NYCRR 212 .10 (c) (4) (i)

VOC removal efficiency greater than 81% is considered RACT.

6NYCRR 212 .10 (c) (4) (iii)

This rule allows those sources which cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the department.

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.

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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 212 .4 (b)

212.4(b) establishes a limit on gas and liquid particulates.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .5 (d)

This section specifies that if best available control technologies are implemented the commissioner may specify, under certain situations, a less restrictive emission rate.

6NYCRR 212 .6 (a)

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

6NYCRR 212 .9 (b)

This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

6NYCRR 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.

6NYCRR 225-1.7 (c)

Measurements must be made daily of the rate of fuel burned. The gross heat and ash content must be determine once per week. For sources producing electricity for sale, they must measure electrical output and generation rate.

6NYCRR 225-1.8 (a)

Records pertaining to fuel analysis; fuel received, burned or sold; stack sampling, monitoring and other procedures may be required to be retained for three years.

6NYCRR 226 .2

General solvent metal cleaning requirements to minimize solvent emissions.

6NYCRR 226 .3 (a)

Cold cleaning degreasing equipment requirements.

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6NYCRR 226.4 (a)

Cold cleaning degreasing operating requirements.

6NYCRR 227.2 (b) (1)

This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.1 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6NYCRR 227-1.2 (a) (1)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units of greater than 250 mmBtu/hr heat input capacity which fire coal, oil, or coal derived fuels.

6NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-2.4 (b) (1)

This paragraph provides a table for gas only, gas and/or oil firing capable, pulverized coal, and overfeed stoker emission limits. Compliance is determined by a stack test.

6NYCRR 227-2.4 (c) (2)

This regulation requires mid-size boilers (fuel combustion units with a maximum heat input capacity greater than 50 million Btu per hour and equal to or less than 100 million Btu per hour that produce steam or heats water or any other heat transfer medium) to meet the following emission limits (listed in pounds NO_x per million Btu) by May 31, 1985:

for Gas fuel -	0.10
for Distillate Oil -	0.12
for Residual Oil -	0.30

Compliance with these emission limits are determined with a 1-hour average in accordance with section 227-2.6(a)(4). If CEMs are used to determine compliance, the requirements of 227-2.6(b) apply, including the use of a 24-hour averaging period.

6NYCRR 227-2.4 (d)

Reasonably available control technology (RACT) based emission limits for NO_x from small boilers (< 50 million Btu/hr).

6NYCRR 227-2.5 (a)

The owner/operator may switch to a cleaner fuel during the ozone season if the quantifiable annual NO_x emissions are less than or equal to those which would be obtained through the application of NO_x RACT.

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6NYCRR 227-2.6

Testing, monitoring and reporting requirements for NOx RACT compliance for combustion sources.

6NYCRR 229 .3 (e) (1)

For a fixed roof storage tank storing volatile organic liquids, the tank must be equipped with an internal floating roof with a liquid-mounted primary seal and gasket fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-free for other purposes.

In this case, the equivalent control requirement has been met with a combination of submerged fill plus the scrubbers on emission points 62005 and 62011 for Processes TDI and TRC. For Process TRD, the hazardous waste incinerators are used (emission points 97001, 97002, and 97003.) The efficiencies alone are over 99% more effective than an internal floating roof with a liquid-mounted primary seal and gasket fittings. No additional monitoring is necessary.

6NYCRR 229 .3 (e) (2) (iv)

Volatile organic liquid storage tanks with capacities greater than or equal to 10,000 gal but less than 20,000 gal must be equipped with submerged fill.

6NYCRR 229 .3 (e) (2) (v)

Volatile organic liquid storage tanks with capacities less than 10,000 gal. must be equipped with a conservation vent.

6NYCRR 229 .5 (d)

The owner/operator of a facility with volatile organic liquid storage tanks at major facilities must keep records of the capacities (in gallons) on site for five years.

6NYCRR 231-2

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

6NYCRR 231-2.6

This section represents the required provisions and criteria for certification, registration, and use of emission reductions as ERCs.

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.

Compliance Certification

Summary of monitoring activities at GE SILICONES WATERFORD FACILITY:

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Condition 30: Applicable Federal Requirement: 6NYCRR 201-7.1 (231 cap)
The Compliance Certification applies to:

Emission Unit: C-62008 Process: OFO

Regulated Contaminants:

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY210-00-0
Name: OXIDES OF NITROGEN

The MCS Hot Oil Furnaces are permitted to have the capability to burn #2 fuel oil for 984 hours per year per furnace. This certification is result of an emissions cap (from the Non-Attainment New Source Review regulations under 6 NYCRR 231-2) based on the MCS IV expansion project. The furnaces currently do not have the capability of burning #2 fuel oil. This certification will become effective once the furnaces are physically able to burn oil. Compliance will be based on recording the number of hours each day that the furnaces burn oil. The total 12-month rolling average is limited to 984 hours per year per furnace. The hourly limit was based upon AP-42 emission factors for PM and NOx.

Condition 31: Applicable Federal Requirement: 6NYCRR 201-7.1 (PSD cap)
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant:

CAS No: 007446-09-5
Name: SULFUR DIOXIDE

Combustion devices that use #2 fuel oil are limited to 0.5% sulfur content. This requirement is a result of emissions capping (from the Prevention of Significant Deterioration regulations under 40 CFR 52) based on the MCS IV expansion project. Compliance will be based on vendor certifications that certify the sulfur content in the oil.

Condition 1-6: Applicable Federal Requirement: 6NYCRR 212.
The Compliance Certification applies to:

Emission Unit: C-27018 Emission Points: 97001, 97002 & 97003

Regulated Contaminants:

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY998-00-0
Name: VOC

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The facility's hazardous waste incinerators (the Rotary Kiln Incinerator (RKI) and the Fixed-Box Incinerator (FB#2)) are required to meet the hazardous waste emissions control requirements of its Part 373 permit under the Resource Conservation and Recovery Act (RCRA). By meeting the control parameter requirements of the Part 373 permit, the air pollution requirements for particulates under 6 NYCRR 212.4(c) and the VOC RACT requirements under 6 NYCRR 212.10 are met. The parameters for the RKI are based on a successful trial burn in 1995, and the parameters for the Fixed Box incinerator are based on a successful trial burn in 1992. The current permit is dated January 12, 1999.

Condition 1-7: Applicable Federal Requirement: 6NYCRR 212.3(a)
The Compliance Certification applies to:

Emission Unit: F-INISH Emission Points: 30907, 37004, 37018 & 37812

This certification are for sources whose date of construction preceded July 1, 1973. The emission points do not currently require control efficiencies. If an alteration to the source is proposed to occur, the facility will calculate the emissions from the alteration and follow the facility's approved operational flexibility plan to determine possible regulatory requirements and/or permit modifications.

Condition 1-8: Applicable Federal Requirement: 6NYCRR 212.4(a)
The Compliance Certification applies to:

Emission Unit: F-INISH Emission Points: 31037 & 76001
Emission Unit: F-INISH Processes: BE1, BE2, BM2, BQD, DM5, ESH, TRF, 3MH, 5PR, DG2, TFS, TTU, ESV, HAS, RCC & WSP

The certification is for sources whose date of construction is after July 1, 1973. The emission points do currently require emissions control. If an alteration to the source is proposed to occur, the facility will calculate the emissions and control efficiencies from the alteration and follow the facility's approved operational flexibility plan to determine possible additional regulatory requirements and/or permit modifications.

Condition 1-9: Applicable Federal Requirement: 6NYCRR 212.4(b)
The Compliance Certification applies to:

Emission Unit: F-INISH Emission Points: 31031, 31036, 33024 & 33902
Emission Unit: F-INISH Process: BMD Emission Source: DS301
Emission Unit: F-INISH Process: WP1 Emission Source: DT701 & DT702
Emission Unit: F-INISH Processes: DEG, TKA, TKB, TKS, TTS, TTW, SP2, SPK, TKC, TKF, AST, DCR, TKD, TKE, ERB, FK1, FK2, FKP, DDS, PYK, BM1, RK1, RK2, BM4, BMT, EDT, TFU, WDU, DWC, DWD, DWE, DWF, DWG, DWH, DWI, DWJ, FRP, 2MH, PAV, PRL, 2MD, PKR, 4MD, END, GP3, EOB, PRS, FC3, 5PR, DFP, RHS, SSE, 4MT, FFQ, APS, BBM, LAS, TK1, 1MR, 3MH, 1MV, 1MH, 1FS, 1ME, TK2, ESV, SKV, PDM, DSH, BRV, TFE, CFM, DUA, HTA & HTB

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The certification is for sources whose date of construction is after July 1, 1973. The emission points do not currently require emissions control. If an alteration to the source is proposed to occur, the facility will calculate the emissions and control efficiencies from the alteration and follow the facility's approved operational flexibility plan to determine possible additional regulatory requirements and/or permit modifications.

Condition 2-1: Applicable Federal Requirement: 6NYCRR 212.4(c)
The Compliance Certification applies to:

Emission Unit: C-27018 Process: SFH
Emission Unit: C-61007 Emission Point: 61007
Emission Unit: C-62008 Emission Points: 55001, 55006, 55007, 57001, 62008 & 62009
Emission Unit: C-62014 Emission Point: 68002, 68003 & 68004
Emission Unit: F-INISH Emission Points: 24120, 24132, 31003, 31022, 31030, 32006, 32007, 32008, 32009, 32016, 32017, 32038, 33002, 33003, 33004, 37707, 37934, 42012, 76004, 76005, 78005, 85002, 16004 & 95002
Emission Unit: T-14009 Emission Point: 14006

Regulated Contaminant:

CAS No: 0NY075-00-0
Name: PARTICULATES

The certification ensures compliance with the particulate loading and opacity regulations under 6 NYCRR 212.4(c) and 6 NYCRR 212.6(a). For the affected points, the facility will visually inspect the vent to determine if particulate emissions are above normal. The inspections will occur monthly for emission points with control devices and annually for emission points without control devices. If the visual observation indicates that particulate emissions are above normal, then the source is to be repaired, and a Method 9 test is required within 2 days of the startup of the equipment after repairs. If the Method 9 test shows opacity over 20% for a 6-minute average, then the DEC is to be notified. If an emission point fails a Method 9 test more than once in a 12-month period, then the facility is required to perform a stack test of the emission point. A test protocol is required within 30 days of the second failed Method 9 test.

Condition 41: Applicable Federal Requirement: 6NYCRR 212.5(d)
The Compliance Certification applies to:

Emission Unit: F-INISH Emission Point: 76001
Emission Unit: F-INISH Processes: ESV, HAS & WSP

The facility has filed a Best Available Control Technology (BACT) analysis to the NYSDEC for the Building 76 VGS scrubber. NYSDEC has approved the analyses, and the State Implementation Plan (SIP) revision request has been sent to the EPA.

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Condition 2-2: Applicable Federal Requirement: 6NYCRR 212.6(a)
The Compliance Certification applies to:

Emission Unit: C-27018 Process: SFH
Emission Unit: C-27018 Emission Points: 62005, 62007, 62011, 97001, 97002 & 97003
Emission Unit: C-62008 Emission Points: 55001, 55006, 55007, 57001, 62008, 62009
Emission Unit: C-62014 Emission Points: 68001, 68002, 68003 & 68004
Emission Unit: F-INISH Emission Points: 24120, 24132, 31003, 31022, 31030, 32006, 32007, 32008, 32009, 32016, 32017, 32038, 33002, 33003, 33004, 37707, 37934, 42012, 76004, 76005, 78005 & 85002
Emission Unit: T-14009 Emission Points: 16004 & 14006
Emission Unit: C-61007 Emission Point: 61007
Emission Unit: W-97004 Emission Point: 95002

Regulated Contaminant:

CAS No: 0NY075-00-0
Name: PARTICULATES

The certification ensures compliance with the particulate loading and opacity regulations under 6 NYCRR 212.4(c) and 6 NYCRR 212.6(a). For the affected points, the facility will visually inspect the vent to determine if particulate emissions are above normal. The inspections will occur monthly for emission points with control devices and annually for emission points without control devices. If the visual observation indicates that particulate emissions are above normal, then the source is to be repaired, and a Method 9 test is required within 2 days of the startup of the equipment after repairs. If the Method 9 test shows opacity over 20% for a 6-minute average, then the DEC is to be notified. If an emission point fails a Method 9 test more than once in a 12-month period, then the facility is required to perform a stack test of the emission point. A test protocol is required within 30 days of the second failed Method 9 test.

Condition 43: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification applies to:

Emission Unit: F-INISH Processes: 1FS & TTU

Regulated Contaminant:

CAS No: 0NY998-00-0
Name: VOC

The Building 71 Fluorosilicone Reactor is controlled by a water scrubber (Emission Point 71013). The chlorosilane emissions (which are VOCs) react with the scrubber water to form siloxanes (non-VOCs) and hydrochloric acid (non-VOC). The efficiency of the scrubber exceeds 81 percent control for VOCs, based on engineering analyses. The scrubber will be monitored by confirming and recording that the water flow is on during periods when emissions are entering the scrubber. The scrubber will be monitored once per batch of product. Should there be alterations in the emissions (new grade, change to

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an existing batch, etc.), the emissions will be calculated using the BatchCalc spreadsheets to determine if the scrubber is meeting the required 81 percent efficiency under 212 VOC RACT.

Condition 44: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification applies to:

Emission Unit: F-INISH Emission Points: 76001 & 76006
Emission Unit: F-INISH ProcessES: 3MH, 5PR, BE1, BE2, BND, BQD, HAS & TFS

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

The certification identifies the emission sources which have control efficiencies that meet the 81% control for VOC Reasonably Available Control Technology (RACT). If any alterations to these sources are proposed, then the facility will determine the emissions of the batch operations by engineering calculations and the control efficiencies through process engineering calculations and/or modeling. The results will be reviewed to determine if the facility continues to meet the control requirements under RACT.

Condition 1-12: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification applies to:

Emission Unit: F-INISH Processes: BND & BQD

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

The upper limit of 55 degrees Celcius ensures that the condenser is meeting the required control efficiency of 81% for VOC RACT for all steps of all grades. The temperature will be recorded once per batch. If the temperature exceeds the 55 degree limit, then the facility will determine if the individual grade in question meets the 81% control at the higher temperature. The determination will be completed using engineering calculations and estimates based on EPA's Guidance for Estimating Emissions for Batch Operations.

Condition 1-13: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)
The Compliance Certification applies to:

Emission Unit: F-INISH Processes: 1ME, ESV, HAS & WSP

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

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The facility has filed a Reasonably Available Control Technology (RACT) analysis to the NYSDEC for the affected sources. NYSDEC has approved the analyses, and the State Implementation Plan (SIP) revision request has been sent to the EPA.

Condition 53: Applicable Federal Requirement: 6NYCRR 227-1.3
The Compliance Certification applies to:

Emission Unit: U-28002 Process: C6O
Emission Unit: U-28003 Processes: A6O & B6O

For Boilers 13, 14, and 15, on days in which fuel oil is burned, a visual observation will be conducted to determine if a smoke plume is generated. If a smoke plume is observed for two consecutive oil burning days, then a Method 9 opacity test will be conducted within 2 days of the second occurrence. If the test fails the opacity standard, then the DEC Regional office is to be contacted within 1 business day. The facility will use an electronic spreadsheet for recording the observations.

Condition 1-14: Applicable Federal Requirement: 6NYCRR 229.3(e)(1)
The Compliance Certification applies to:

Emission Unit: C-27018 ProcessES: TDI, TRC & TRD

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

To comply with the VOL storage tank provisions, the chlorosilane tanks are equipped with a submerged fill, and the vents for Processes TDI and TRC are routed to one of two water scrubbers (Emission points 62005 or 62011). For Oricess TRD, the hazardous waste incinerators are used (emission points 97001, 97002, and 97003.) The chlorosilanes when reacted with water form siloxane gel (a non-VOC) and hydrochloric acid. The water treats the hydrochloric acid at over 99 percent efficiency. By using the scrubbers or incinerators, the control efficiency exceeds that achievable by internal floating roofs.

Condition 56: Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(iv)
The Compliance Certification applies to:

Emission Unit: C-27018 Processes: TBA & TR2

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

This certification covers the three storage tanks. The tanks have submerged fill, and the vent lines are

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routed to the MCS Vent Scrubbers (Emission points 62005 and 62011). Opening the tanks for an annual inspection would cause potential safety hazards, so by using the vent scrubbers, the facility meets the control requirements of 6 NYCRR 229.

Condition 57: Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(iv)
The Compliance Certification applies to:

Emission Unit: F-INISH	Process: PRB	Emission Sources: HB501, HB601 & HB701
Emission Unit: F-INISH	Process: PRW	Emission Sources: HB501, HB601 & HB701
Emission Unit: F-INISH	Process: TBB	Emission Source: HO105
Emission Unit: F-INISH	Process: TBW	Emission Source: HO105

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

The certification covers VOL storage tanks with capacities between 10,000 and 20,000 gallons. The tanks are required to have submerged fills. The facility will inspect the submerged fills annually to ensure proper operation. Records will include dates of inspections, any findings, and repairs and replacements.

Condition 58: Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(iv)
The Compliance Certification applies to:

Emission Unit: F-INISH Processes: HXT & MSS

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

The certification covers two VOL storage tanks. These tanks are equipped with submerged fills, but they also have vapor return lines, so no emissions are generated. To comply with this certification, the facility will inspect the vapor return lines annually for defects. If defects are found, then repairs will be made and documented.

Condition 59: Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(iv)
The Compliance Certification applies to:

Emission Unit: C-27018 Process: TNV & TVS

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

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The certification covers VOL storage tanks which are between 10,000 and 20,000 gallons in capacity. The tanks are required to have submerged fills. These tanks have submerged fills, but they are also routed to the facility's hazardous waste incinerators (Emission Points 97001, 97002, and 97003). By monitoring the emissions control parameters of the hazardous waste incinerators, the control exceeds the requirements of 6 NYCRR 229.

Condition 60: Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(v)
The Compliance Certification applies to:

Emission Unit: F-INISH Emission Point: 24141
Emission Unit: F-INISH Processes: HTA, HTB, WEB, WEW & WPT
Emission Unit: F-INISH Process: TAB Emission Source: HO102
Emission Unit: F-INISH Process: TAW Emission Source: HO102

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

The certification covers VOL storage tanks with capacities of less than 10,000 gallons. The tanks are required to have conservation vents for emissions control. To ensure proper operation, the conservation vents are required to be inspected annually. The records include the inspection date, the inspection findings, and a list of repairs, if needed.

Condition 61: Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(v)
The Compliance Certification applies to:

Emission Unit: W-97004 Emission Points: 97041 & 97042

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

The certification covers two VOL storage tanks in the Wastewater Treatment Plant area that have capacities of less than 10,000 gallons. The tanks are required to have conservation vents.

Condition 64: Applicable Federal Requirement: 40CFR 60.112b(a)(3), NSPS Subpart Kb
The Compliance Certification applies to:

Emission Unit: C-27018 Processes: TDI, TR2, TRC & TRD

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

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The certification covers VOL storage tanks which are subject to the New Source Performance Standards for VOL Storage Tanks (40 CFR 60 Subpart Kb). These tanks meet compliance by using the MCS Vent scrubbers (Emission Points 62005 and 62011). The vent emissions from the tanks reacts with water to form siloxane gum (a non-VOC) and hydrochloric acid (a non-VOC). By monitoring the scrubbers, the control devices meet the requirements of NSPS Subpart Kb. The closed vent system was tested for non-detectable emissions in 1999.

Condition 65: Applicable Federal Requirement: 40CFR 60.113b(c), NSPS Subpart Kb
The Compliance Certification applies to:

Emission Unit: C-27018 Processes: TDI, TR2, TRC & TRD

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

The certification covers VOL storage tanks which are subject to the New Source Performance Standards for VOL Storage Tanks (40 CFR 60 Subpart Kb). These tanks meet compliance by using the MCS Vent scrubbers (Emission Points 62005 and 62011). The facility submitted an approved operational plan to the EPA in 1997.

Condition 66: Applicable Federal Requirement: 40CFR 60.115b(c), NSPS Subpart Kb
The Compliance Certification applies to:

Emission Unit: C-27018 Processes: TDI, TR2, TRC & TRD

Regulated Contaminant:
CAS No: 0NY998-00-0
Name: VOC

The certification covers VOL storage tanks which are subject to the New Source Performance Standards for VOL Storage Tanks (40 CFR 60 Subpart Kb). These tanks meet compliance by using the MCS Vent scrubbers (Emission Points 62005 and 62011). The facility submitted an approved operational plan to the EPA in 1997. The facility will monitor parameters for the MCS Vent Scrubbers through compliance certifications that are included within the Title V Permit.

Condition 74: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)

The Compliance Certification activity will be performed for:

Emission Unit: C-23002

Regulated Contaminant:

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CAS No: 0NY998-00-0

Name: VOC

The certification applies to the Area 23 Tank Farm Scrubber (Emission Point 23001). The tank farm stores chlorosilane (regulated VOCs) which react with the water in the scrubber to produce fully-methylated siloxanes (non-VOCs) and hydrochloric acid (non-VOC). The scrubber control efficiency exceeds the required 81 percent control efficiency, based on engineering assessments. The scrubber will certify compliance by monitoring the water flow rate to the scrubber to ensure a minimum of 20 gpm (24-hour average). Condition 30: Applicable Federal Requirement: 6NYCRR 201-7.1 (231 cap)

The Compliance Certification applies to:

Emission Unit: C-62008 Process: OFO

Regulated Contaminants:

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

The MCS Hot Oil Furnaces are permitted to have the capability to burn #2 fuel oil for 984 hours per year per furnace. This certification is result of an emissions cap (from the Non-Attainment New Source Review regulations under 6 NYCRR 231-2) based on the MCS IV expansion project. The furnaces currently do not have the capability of burning #2 fuel oil. This certification will become effective once the furnaces are physically able to burn oil. Compliance will be based on recording the number of hours each day that the furnaces burn oil. The total 12-month rolling average is limited to 984 hours per year per furnace. The hourly limit was based upon AP-42 emission factors for PM and NOx.

Condition 120: Applicable Federal Requirement: 40CFR 63.104, Subpart F

The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Process: HWW

Regulated Contaminant:

CAS No: 0NY100-00-0

Name: HAP

To comply with the heat exchanger provisions of 40 CFR 63 Subpart F, the cooling water shall be monitored for total TOC using EPA Method 415.2. The cooling water shall be monitored monthly for the first six months and quarterly thereafter.

Condition 130: Applicable Federal Requirement: 40CFR 63.113, Subpart G

The Compliance Certification activity will be performed for:

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Emission Unit: C-27018 Process: MCS

Regulated Contaminant:

CAS No: 0NY100-00-0

Name: HAP

In order to comply with 40 CFR 63 Subpart G for the Methyl Chloride Area vent compressor streams, the streams are vented to combustion devices (MCS Vent Incinerator, RKI Incinerator, or Fixed Box Incinerator). Each combustion device has a halogen reduction device (scrubber(s)) for control. For the MCS Vent Incinerator, 95% overall halogen and halogen halide control efficiencies are based on 1993 and 1996 stack tests. The Fixed Box Incinerator is based on its 1992 trial burn, and the RKI incinerator efficiencies are based on its 1995 trial burn.

Condition 131: Applicable Federal Requirement: 40CFR 63.113(a)(2), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Process: MCS

In order to comply with 40 CFR 63 Subpart G for the Methyl Chloride Area vent compressor streams, the streams are vented to combustion devices (MCS Vent Incinerator, RKI Incinerator, or Fixed Box Incinerator). Each combustion device has a halogen reduction device (scrubber(s)) for control. For the MCS Vent Incinerator, Organic HAP control efficiencies are based on 1993 and 1996 stack tests. The Fixed Box Incinerator is based on its 1992 trial burn, and the RKI incinerator efficiencies are based on its 1995 trial burn.

Condition 133: Applicable Federal Requirement: 40CFR 60.662(a), NSPS Subpart NNN
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Process: MIV

Regulated Contaminant:

CAS No: 0NY502-00-0

Name: 40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)

For compliance with 40 CFR 60 Subpart NNN for the MCS 4 Methyl Chloride Recovery Column, the permittee shall reduce emissions of TOC (less methane and ethane) by 98 weight-percent, or to a TOC (less methane and ethane) concentration of 20 ppmv, on a dry basis corrected to 3 percent oxygen, whichever is less stringent. For the boiler or process heater used to comply with this paragraph, the vent stream shall be introduced into the flame zone of the boiler or process heater.

The streams are vented to combustion devices (MCS Vent Incinerator, RKI Incinerator, or Fixed Box Incinerator). For the MCS Vent Incinerator, TOC control efficiencies are based on 1996 stack tests. The Fixed Box Incinerator is based on its 1992 trial burn, and the RKI incinerator efficiencies are based on its 1995 trial burn.

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Condition 134: Applicable Federal Requirement: 40CFR 60.663(a), NSPS Subpart NNN
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Process: MIV

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

For compliance with 40 CFR 60 Subpart NNN for the MCS 4 Methyl Chloride Recovery Column, the facility uses an incinerator for compliance. It has installed, and does calibrate, maintain, and operate according to manufacturer's specifications, a temperature monitoring device equipped with a continuous recorder and having an accuracy of +/- 1 % of the temperature being monitored expressed in degrees Celsius or +/- 0.5 deg C, whichever is greater.

Condition 141: Applicable Federal Requirement: 40CFR 60.662(a), NSPS Subpart NNN
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Process: MTC

Regulated Contaminant:

CAS No: 0NY502-00-0

Name: 40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)

For compliance with 40 CFR 60 Subpart NNN for the 114B Column, the permittee shall reduce emissions of TOC (less methane and ethane) by 98 weight-percent, or to a TOC (less methane and ethane) concentration of 20 ppmv, on a dry basis corrected to 3 percent oxygen, whichever is less stringent. For the boiler or process heater used to comply with this paragraph, the vent stream shall be introduced into the flame zone of the boiler or process heater.

The streams are vented to combustion devices (MCS Vent Incinerator, RKI Incinerator, or Fixed Box Incinerator). For the MCS Vent Incinerator, TOC control efficiencies are based on 1996 stack tests. The Fixed Box Incinerator is based on its 1992 trial burn, and the RKI incinerator efficiencies are based on its 1995 trial burn.

Condition 147: Applicable Federal Requirement: 6NYCRR 231-2.
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Process: SST

Regulated Contaminant:

CAS No: 0NY998-00-0

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Name: VOC

For compliance with the storage tank provisions of 40 CFR 63 Subpart G for the Spent Sulfuric Storage Tank, The water flow to the scrubber is monitored to ensure the scrubber is operating at the required control efficiency (95% for organic HAPs). The required flowrate is 8 gallons per minute (continuous monitoring, 24-hour average). This compliance monitoring requirement also satisfies the 81 percent VOC control efficiency requirements of 6 NYCRR 212 VOC RACT.

Condition 151: Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(v)
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Process: TVS

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

For compliance with the storage tank provisions of 6 NYCRR 229 for the Slurry and Silane Tanks, the tanks have a combination of submerged fill plus the tank vents are routed to the hazardous waste incinerators (EPs 97001, 97002, 97003). The incinerators' efficiencies are 99.9+% for VOCs, which is greater than the required conservation vent.

Condition 159: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 34002 Process: MRC

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

For compliance with the 6 NYCRR 212 VOC RACT provisions for the Methyl Chloride B Train Methanol Revoery Column, the column will be operated so that VOC emissions, calculated on a 12-month rolling basis, do not exceed those which make it economically feasible to install control as evaluated in the economic analysis dated 10/94 (0.62 tons/yr). Emissions will be calculated monthly.

Condition 1-19: Applicable Federal Requirement: 6NYCRR 231-2.
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62005

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

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Capping: Yes

The venturi water flow (GE5C2) is monitored to ensure sufficient control efficiency. (60 gpm, 24-hour average). Monitoring parameters based on 1984 stack test and state facility permit conditions for 1996 MCS IV expansion project. Water flow meets particulate loading requirements.

This monitoring activity also assures compliance with the requirements of 6 NYCRR 212.10(c)(4)(i), and 40 CFR 60 Subpart Kb.

Condition 1-20: Applicable Federal Requirement: 6NYCRR 212.4(c)
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62005

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

For compliance with the particulate provisions of 6 NYCRR Part 212, for the East MCS Vent Scrubber, the water flow to the tower scrubber will be monitored (90 gallons per minute, 24-hour average). The control efficiency is based on engineering analyses.

This monitoring activity also meets the requirements of 6 NYCRR 212 VOC RACT, 40 CFR 60 Subpart Kb, and ensures the prevention of Part 231 Non-Attainment New Source Review.

Condition 165: Applicable Federal Requirement: 6NYCRR 231-2.
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62005

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Capping: Yes

The spray tower water flow (GE5C1) is monitored to ensure sufficient control efficiency (90 gpm, 24-hour average). Monitoring parameters based on 1984 stack test and state facility permit conditions for 1996 MCS IV expansion project. Water flow meets particulate loading requirements.

Condition 166: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

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Emission Unit: C-27018 Emission Point: 62007

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

The scrubber water flow (ES-GE7C2) is monitored to ensure sufficient control efficiency (100 gpm, 24-hour average). Monitoring parameters based on 1992 stack test for HCl/chlorine emissions and 1996 stack test for 40 CFR 60 Subpart NNN compliance.

This monitoring activity also meets the requirement of 212.4(c) (grain loading for PM).

Condition 167: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62007

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

The fire box temperature (ES-GE7C1) is monitored to ensure sufficient control efficiency (1750, 24-hour average). Monitoring parameters based on 1996 stack test for 40 CFR 60 Subpart NNN compliance.

Condition 169: Applicable Federal Requirement: 40CFR 63.114(a)(3), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62007 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

The fire box temperature (ES-GE7C1) is monitored to ensure sufficient control efficiency (1750, 24-hour average). Monitoring parameters based on 1996 stack test for 40 CFR 60 Subpart NNN compliance.

Condition 170: Applicable Federal Requirement: 40CFR 63.114(a)(4)(i), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62007 Process: MCS

Regulated Contaminant(s):

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CAS No: 0NY100-00-0 HAP

pH monitoring (0.3, 24-hour average). Monitoring parameters based on engineering calculations for maximum methyl chloride loading to the incinerator. Part of 7/2001 Amendment to Notification of Compliance under 40 CFR 63 Subpart G.

Condition 171: Applicable Federal Requirement: 40CFR 63.114(a)(4)(ii), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62007 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Gas flow rate (6500 cfm, 1 time). Monitoring parameter based on maximum design flowrate. Part of July, 2001 Amendment to Notification of Compliance under 40 CFR 63 Subpart G.

Condition 172: Applicable Federal Requirement: 40CFR 63.114(a)(4)(ii), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62007 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

The scrubber water flow (ES-GE7C2) is monitored to ensure sufficient control efficiency (100 gpm, 24-hour average). Monitoring parameters based on 1992 stack test for HCl/chlorine emissions and 1996 stack test for 40 CFR 60 Subpart NNN compliance.

Condition 174: Applicable Federal Requirement: 6NYCRR 231-2.
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62011

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Capping: Yes

The spray tower water flow (GE5C1) is monitored to ensure sufficient control efficiency (90 gpm, 24-hour average). Monitoring parameters based on 1984 stack test and state facility permit conditions for 1996 MCS IV expansion project. Water flow meets particulate loading requirements.

This monitoring activity also meets the requirements of 6 NYCRR 212.10(c)(4)(i) for VOC (RACT) and

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6 NYCRR 212.4(c) for PM.

Condition 175: Applicable Federal Requirement: 6NYCRR 231-2.
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 62011

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Capping: Yes

The venturi water flow (GE5C2) is monitored to ensure sufficient control efficiency. (125 gpm, 24-hour average). Monitoring parameters based on 1984 stack test and state facility permit conditions for 1996 MCS IV expansion project. Water flow meets particulate loading requirements.

This monitoring activity also meets the requirements of 6 NYCRR 212.10(c)(4)(i) for VOC (RACT) and 6 NYCRR 212.4(c) for PM.

Condition 177: Applicable Federal Requirement: 40CFR 63.114(a)(4)(i), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97001 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

pH monitoring (8.4, 24-hour average). Monitoring Based on 1991 Trial Burn. Condition part of RCRA Permit #5-4154-00002-00357-1.

Condition 178: Applicable Federal Requirement: 40CFR 63.114(a)(4)(ii), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97001 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Countercurrent scrubber flow (860 gpm, 24-hour average). Monitoring Based on 1991 Trial Burn.

Condition 179: Applicable Federal Requirement: 40CFR 63.114(a)(4)(ii), Subpart G

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The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97001 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Gas flow rate (7010 cfm, 1 time). Monitoring Based on 1991 Trial Burn. Condition part of RCRA Permit #5-4154-00002-00357-1.

Condition 180: Applicable Federal Requirement: 40CFR 63.114(a)(1)(i), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97002 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Firebox temperature (970°F, 24-hour average). Monitoring Based on 1991 Trial Burn. Condition part of RCRA Permit #5-4154-00002-00357-1.

Condition 181: Applicable Federal Requirement: 40CFR 63.114(a)(4)(i), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97002 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

pH monitoring (8.4, 24-hour average). Monitoring Based on 1991 Trial Burn. Condition part of RCRA Permit #5-4154-00002-00357-1.

Condition 182: Applicable Federal Requirement: 40CFR 63.114(a)(4)(ii), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97002 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Countercurrent scrubber flow (1083 gpm, 24-hour average). Monitoring Based on 1991 Trial Burn. Condition part of RCRA Permit #5-4154-00002-00357-1.

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Condition 183: Applicable Federal Requirement: 40CFR 63.114(a)(4)(ii), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97002 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Gas flow rate (7020 cfm, 1 time). Monitoring Based on 1991 Trial Burn. Condition part of RCRA Permit #5-4154-00002-00357-1.

Condition 185: Applicable Federal Requirement: 40CFR 63.114(a)(1)(i), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97003 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Firebox temperature (945°F, 24-hour average). Monitoring Based on 1995 Trial Burn. Condition part of RCRA Permit #5-4154-00002-00357-1.

Condition 186: Applicable Federal Requirement: 40CFR 63.114(a)(4)(i), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97003 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

pH monitoring (8.4, 24-hour average). Monitoring Based on 1995 Trial Burn. Condition part of RCRA Permit #5-4154-00002-00357-1.

Condition 187: Applicable Federal Requirement: 40CFR 63.114(a)(4)(ii), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97003 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Gas flow rate (21000 cfm, 1 time). Monitoring Based on 1995 Trial Burn. Condition part of RCRA

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Condition 188: Applicable Federal Requirement: 40CFR 63.114(a)(4)(ii), Subpart G
The Compliance Certification activity will be performed for:

Emission Unit: C-27018 Emission Point: 97003 Process: MCS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Countercurrent scrubber flow (1160 gpm, 24-hour average). Monitoring Based on 1995 Trial Burn.
Condition part of RCRA Permit #5-4154-00002-00357-1.
#5-4154-00002/01757.

Condition 193: Applicable Federal Requirement: 6NYCRR 212.4(c)
The Compliance Certification activity will be performed for:

Emission Unit: C-62014 Process: FSS

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Silane feed rate limited to 3750 lb/hr (24-hour average). Monitoring based on 11/1992 stack test.
Condition limits amount of potential chlorine into control device.

Condition 194: Applicable Federal Requirement: 6NYCRR 212.4(c)
The Compliance Certification activity will be performed for:

Emission Unit: C-62014 Process: FSS

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Scrubber recirculation rate (90 gpm, 24-hour average). Monitoring based on 11/1992 stack test.

Condition 195: Applicable Federal Requirement: 6NYCRR 231-2.
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH

Regulated Contaminant(s):

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CAS No: 0NY998-00-0 VOC

Capping: Yes

Calculate VOC emissions to confirm that emissions do not exceed the cap of 201.5 tpy. Monitoring based on April, 2000 state facility permit for Finishing area. Cap based on NNSR analysis for previous two years actuals.

Condition 196: Applicable Federal Requirement: 40CFR 52.21, Subpart A
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Capping: Yes

Calculate PM emissions to confirm that they do not exceed the cap of 62.5 tpy. Monitoring based on April, 2000 state facility permit for Finishing area. Cap based on NNSR analysis for previous two years actuals.

Condition 197: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Process: BE1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Water flow to the scrubber is recorded (on/off) to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in 12/1998. Water flow ensures 81% VOC control. This process is controlled by one eductor scrubber which emits through two emission points 24946 and 24947.

Condition 198: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Process: BE2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

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Water flow to the scrubber is recorded (on/off) to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in December, 1998. Water flow ensures 81% VOC control. This process emits through two emission points 24946 and 24947.

Condition 199: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Process: DG2

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Each condenser's outlet gas temperature will be monitored when the ERP of VOCs exceed 3 lb/hr. This process emits through five emission points 32040, 32042, 32044, 32049 and 32050 (30°C). Monitoring based on engineering calculations submitted to DEC in 8/1998. Temperature ensures 81 percent VOC control for all grades.

Condition 200: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 24105 Process: SP2

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Calculate VOC emissions to confirm that emissions do not exceed 4.92 tpy which would make it economically feasible to install control as evaluated in the economic analysis dated 08/18/94. Monitoring based on August, 1994 VOC RACT Economic analysis.

Condition 201: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 24806

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Calculate VOC emissions to confirm that emissions do not exceed 1.1 tpy (rolled monthly) which would make it economically feasible to install control as evaluated in the economic analysis dated 10/17/94. Monitoring based on 8/1994 VOC RACT Economic analysis.

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Condition 202: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 31036

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

During Toluene cleanouts in any of the Drais mixers, outlet Glycol temperature of the condenser DK6C1 and DK6C2 will be monitored to temperature of the condenser DK6C1 and DK6C2 will be monitored to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in 6/1998. Temperature ensures 81 percent VOC control.

Condition 203: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 31037

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Water flow to the scrubber will be monitored to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in June, 1998. Water flow ensures 81 percent VOC control.

Condition 204: Applicable Federal Requirement: 6NYCRR 212.10(a)(2)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 32006 Process: DG1 Emission Source: DM601

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Grades produced in Doughmixer #3 will be recorded. Doughmixer #3 will not process any condenser grades (grades with a VOC ERP of greater than 3 lb/hr). Monitoring based on engineering calculations submitted to DEC in August, 1998.

Condition 1-22: Applicable Federal Requirement: 6NYCRR 212.10(a)(2)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 32007 Process: DG1 Emission Source: DM701

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

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Grades produced in Doughmixer 5 will be recorded. Grades with VOCs >3 lb/hr will vent only to the condenser (EP32044) during cook, and not to EP 32007. Monitoring based on engineering calculations submitted to DEC in August, 1998.

Condition 206: Applicable Federal Requirement: 6NYCRR 212.10(a)(2)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 32008 Process: DG1 Emission Source: DM801

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Grades produced in Doughmixer 6 will be recorded. Grades with VOCs >3 lb/hr will vent only to the condenser (EP32040) during cook, and not to EP 32008. Monitoring based on engineering calculations submitted to DEC in August, 1998.

Condition 207: Applicable Federal Requirement: 6NYCRR 212.10(a)(2)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 32009 Process: DG1 Emission Source: DM901

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Grades produced in Doughmixer 7 will be recorded. Grades with VOCs >3 lb/hr will vent only to the condenser (EP32049) during cook, and not to EP 32009. Monitoring based on engineering calculations submitted to DEC in August, 1998.

Condition 208: Applicable Federal Requirement: 6NYCRR 212.10(a)(2)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 32016 Process: DG1 Emission Source: DN601

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Grades produced in Doughmixer 8 will be recorded. Grades with VOCs >3 lb/hr will vent only to the condenser (EP32042) during cook, and not to EP 32016. Monitoring based on engineering calculations submitted to DEC in August, 1998.

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Condition 209: Applicable Federal Requirement: 6NYCRR 212.10(a)(2)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 32017 Process: DG1 Emission Source: DN701

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Grades produced in Doughmixer 9 will be recorded. Grades with VOCs >3 lb/hr will vent only to the condenser (EP32050) during cook, and not to EP 32016. Monitoring based on engineering calculations submitted to DEC in August, 1998.

Condition 210: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 32028 Process: TFS

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Scrubber water flow during stripping will be monitored to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in 11/1998. Water flow ensures 81 percent VOC control.

Condition 1-23: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 37059 Process: 5PR

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

For grade 88476 (rework) the condenser outlet gas temperature will be maintained to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in 1998. Temperature ensures 81 percent VOC control.

Condition 218: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 76001

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

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A flow meter is used to monitor the water flow rate to the scrubber to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in 12/1998. Water flow ensures 81 percent VOC control.

Condition 219: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 76006

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Water flow to the third stage of the scrubber will be monitored to ensure sufficient control efficiency. Monitoring based on 1986 stack test. Water flow ensures 81 percent VOC control.

Condition 220: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)

The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 76006

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Water flow to the second stage of the scrubber will be monitored to ensure sufficient control efficiency. Monitoring based on 1986 stack test. Water flow ensures 81 percent VOC control.

Condition 221: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 76006

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Water flow to the first stage of the scrubber will be monitored to ensure sufficient control efficiency. Monitoring based on 1986 stack test. Water flow ensures 81 percent VOC control.

Condition 1-25: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

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Emission Unit: F-INISH Emission Point: 76006

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Spray tower flowrate will be monitored to ensure sufficient control efficiency. Monitoring based on 1986 stack test. Water flow ensures 81 percent VOC control.

Condition 223: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 76710 Process: HAS

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

High acid scrubber water flow will be monitored to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in December, 1998.

Condition 224: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 76711 Process: HAS

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

High acid scrubber water flow will be monitored to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in December, 1998.

Condition 225: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH Emission Point: 85008 Process: RCC

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Outlet temperature of condensing column HO8C1 will be monitored to ensure sufficient control efficiency. Monitoring based on engineering calculations submitted to DEC in December, 1998.

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Condition 226: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: T-13004 Process: ABA

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

The exit temperature for the condenser outlet (source AB4C1) will not exceed 67 deg C. the temp reading will be recorded daily. Monitoring based on engineering calculations submitted to DEC in 10/2000.

Condition 227: Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)
The Compliance Certification activity will be performed for:

Emission Unit: T-13004 Process: LIM

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

The outlet gas temperature of the condenser will not exceed 30 deg C during use, and will be recorded for each batch. Monitoring based on engineering calculations submitted to DEC in October, 2000.

Condition 228: Applicable Federal Requirement: 6NYCRR 231-2.
The Compliance Certification activity will be performed for:

Emission Unit: U-28002

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Capping: Yes

The total NOx emissions from emission unit U28002 may not exceed 143 tpy based on an annual rolled monthly basis. Monitoring based on emissions cap established for the Boilerhouse CHX project in August, 2001.

Condition 229: Applicable Federal Requirement: 6NYCRR 231-2.
The Compliance Certification activity will be performed for:

Emission Unit: U-28002

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

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Capping: Yes

The total emissions of NO_x from Emission Units U28002 and U28003 (combined) may not exceed 223.5 tpy on a rolling 12 month basis. Fuel use will be monitored to assure compliance with this requirement. Monitoring based on emissions cap established for the MCS V expansion project in 1996.

Condition 230: Applicable Federal Requirement: 6NYCRR 231-2.6
The Compliance Certification activity will be performed for:

Emission Unit: U-28002

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Emissions of NO_x is limited to 62 tpy for emission source CS201(Boiler #13) in order to establish ERCs on an annual-rolled monthly basis. Fuel usage will be recorded and NO_x calculated as 0.42 lb/mmBTU on oil and 0.14 lb/mmBTU on natural gas. Monitoring based on certified Emissions Reduction Credits established in 10/1995. Emission factors based on stack testing for 212 NO_x RACT compliance.

Condition 236: Applicable Federal Requirement: 40CFR 52.21, Subpart A
The Compliance Certification activity will be performed for:

Emission Unit: U-28002

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Capping: Yes

SO₂ emissions may not exceed 42.5 tpy on an annual rolled monthly basis. Monitoring based on emissions cap established for the Boilerhouse CHX project in August, 2001.

Condition 311: Applicable Federal Requirement: 6NYCRR 231-2.6
The Compliance Certification activity will be performed for:

Emission Unit: U-28003 Emission Point: 28003

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Emissions of NO_x is limited to 77 tpy for emission source CS301 (Boiler #14) in order to establish ERCs on an annual-rolled monthly basis. Fuel usage will be recorded and NO_x calculated as 0.43 lb/mmBTU on oil and 0.13 lb/mmBTU on natural gas. Monitoring based on certified Emissions Reduction Credits

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established in October, 1995. Emission factors based on stack testing for 212 NOx RACT compliance.

Condition 312: Applicable Federal Requirement: 6NYCRR 231-2.6
The Compliance Certification activity will be performed for:

Emission Unit: U-28003 Emission Point: 28003

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Emissions of NOx is limited to 20 tpy for emission source CS302 (Boiler #15) in order to establish ERCs on an annual-rolled monthly basis. Fuel usage will be recorded and NOx calculated as 0.41 lb/mmBTU on oil and 0.08 lb/mmBTU on natural gas. Monitoring based on certified Emissions Reduction Credits established in October, 1995. Emission factors based on stack testing for 212 NOx RACT compliance.