New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5205-00013/00058 Modification Number: 1 **12/19/2002**

Facility Identification Data
Name: GLENS FALLS LEHIGH CEMENT COMPANY
Address: 313 WARREN ST
City: GLENS FALLS
Zip: 12801

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

Permit Contacts
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313 WARREN STREET PO BOX 440

Permit Description

Introduction

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

Summary Description of Proposed Project
This modification is to incorporate NOx Budget provisions of 6 NYCRR Part 204. At the same time, all

conditions which were expired in the AFS Library, since the original Title V Permit was issued, are being updated. These include conditions under 6 NYCRR 201-1.4, 201-6.5(c)(3), 201-6.5(c)(3)(ii), 201-6.5(e), 212.3(b), and 40 CFR 60-A.4. The applicable opacity requirement for Emission Point 01123 is being changed from 6NYCRR Part 220.4(d) to 40 CFR 60.62(c) Subpart F due to the initial start date in 1972. In addition; all Facility specific compliance monitoring conditions which previously indicated reporting upon request are being updated to semi-annual reporting to clarify this requirement.

Attainment Status

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

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

The facility consists of cement manufacturing, packaging, and shipping operations and an associated quarry. Major equipment includes stone crushers, storage silos, a cement kiln, a clinker cooler, raw and finish mills, and packaging/bulk loading facilities. The facility began commercial operation during the early 1890's.

Permit Structure and Description of Operations

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

A facility is defined as all emission sources located at one or more adjacent or

contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

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

GLENS FALLS LEHIGH CEMENT COMPANY is defined by the following emission unit(s):
Emission unit URMHND - This emission unit consists of all operations and equipment involved in the storage and handling of raw materials (other than quarry stone). These materials are all solids and may consist of iron bearing materials, silica bearing materials, calcium beari ng materials or other materials which are similar in chemical and/or physical composition. A number of processes within this emission unit have been deemed "insignificant" based on guidance contained in 6 NYCRR 201-6.3 (d) (7).
Emission unit URMHND is associated with the following emission points (EP):
01033, PT950
It is further defined by the following process(es):
Process: B01Loading, unloading, and storage (in piles) of sand and other silica bearing materials. Emissions from this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. These emissions are fugitive loading, unloading, and storage (in piles) of sand and other silica bearing materials. Emissions from this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. These emissions are fugitive.
Process: B02Loading, unloading, and storage (in piles) of iron ore and other iron bearing materials. Emissions from this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. Emissions are fugitive. Loading, unloading, and storage (in piles) of iron ore and other iron bearing materials. Emissions from this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. Emissions are fugitive.
Process: B03Operating of material reclaimer and transfer of stored materials (belts 906, 953, 955, 950 and 956 and the storage pile). Materials transferred include stone, silica bearing, iron bearing, calcium bearing, and other raw materials with similar physical and chemical composition. Emissions from this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. The emissions from this process are fugitive. Emissions from this process are

insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. The emissions from this process are fugitive.
Process: B05Transfer of raw materials to and from storage silos and the silos themselves. Transfers include 950 to 955, 955 to 956, 956 to 957, 957 to 959, 959 to 958, 958 to 960 and 960 to silos.

Emission unit UQUARY - This emission unit consists of all operations and equipment associated with the quarry portion of the facility. Associated sources and emission points include blasting, truck loading/unloading, stone hauling, stone crushing, and material storage/transfer operations. Fugitive emissions within the emission unit include road traffic and storage piles. A number of processes within the emission unit have been deemed "insignificant" based on guidance contained in 6 NYCRR 201-6.3 (d) (7).
Emission unit UQUARY is associated with the following emission points (EP):
00902, 00913
It is further defined by the following process(es):
Process: A01Loading/unloading of trucks and hauling of quarry overburden (excess soils/stone). Throughput information is not required to demonstrate compliance. The emissions associated with this process are fugitive.
Process: A02Loading/unloading of trucks and hauling of resale stone within quarry. Throughput information is not required to demonstrate compliance. The emissions associated with this process are fugitive.
Process: A03Loading/unloading and hauling of stone to quarry crusher. Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.
Process: A04Stockpiling of stone for feeding through crusher. Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.
Process: A05 is located at MAIN - Operation of primary quarry crusher. A portion of the emissions associated with this process are fugitive.
Process: A06Transfer of quarry stone from belt 904 to no. 5 transfer point after crushing. Emissions from this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. These emissions are fugitive.
Process: A07Transfer of crushed quarry stone over various belts to indoor storage. Transfers include no. 5 to no. 1; no. 1 to no. 2 and no. 2 to 906. Emissions from these processes are insignificant per 6 NYCRR 201.6.3 (d) (7). Emissions are fugitive. Throughput information is not required to determine compliance.
Process: A08 is located at MAIN - Transfer of crushed stone through the sample tower.
Process: A09Storage of materials, such as quarry stone, in outdoor piles. Emissions from this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. These emissions are fugitive.
Process: A10Drop out for quarry stone used and sold for road maintenance. Emissions from this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. These emissions are fugitive.
Process: A11Storage of limestone and other calcium bearing materials for use in production or for resale. Emissions from this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. Emissions are fugitive.

Emission unit USHPNG - This emission unit consists of all operations and equipment involved in the packing and bulk shipment of the finished product (cement). Processes include material transfer, weighing, packaging, and the loading of railcars for bulk shipping. A number of processes within this

emission unit have been deemed "insignificant" based on guidance contained in 6 NYCRR 201-6.3 (d) (7).
Emission unit USHPNG is associated with the following emission points (EP):
06000, 06049, 06059, 06302, 06303, 06304, 06305, 06340, 06375, 06695, 07200, 07505, 07526
It is further defined by the following process(es):
Process: P02 is located at MAIN, Building WAREPK - Equipment for bulk loading of finished product (cement) into railcars and trucks.
Process: P03 is located at MAIN, Building WAREPK - The silo 33 air slide system used in the transfer of finished product (cement).
Process: Q02 is located at MAIN, Building WAREPK - Equipment for transferring finished product (cement) from the storage silos to the packaging and bulk loading areas.
Process: Q03 is located at MAIN, Building WAREPK - A cement packaging (bagging) machine.
Process: Q04 is located at MAIN, Building WAREPK - A cement packaging (bagging) machine.

Emission unit 0UKILN - This emission unit consists of all operations and equipment involved in the production of cement clinker by the pyroprocessing (kiln) system. Processes include the transfer and weighing of raw feed, the firing of the kiln, and the transfer of excess cement kiln dust produced by the process. A number of processes within this emission unit have been deemed "insignificant" based on guidance contained in 6 NYCRR 201-6.3 (d) (7).
Emission unit 0UKILN is associated with the following emission points (EP):
01041, 01068, 01070, 01122
It is further defined by the following process(es):
Process: D01 is located at MAIN, Building PRHEAT - Equipment which transfers the kiln feed produced by the raw mill system into the pyroprocessing system or kiln.
Process: D02 is located at MAIN, Building PRECIP - Equipment for storage of kiln dust (produced as a by product of clinker production) which is cleaned out of the kiln exhaust by the electrostatic precipitators.
Process: D03Equipment for collecting and storing kiln dust (in case of emergency) resulting from the operation of the spray tower. Emissions this process are insignificant per 6 NYCRR 201-6.3 (d) (7). Throughput information is not required to determine compliance. Emissions from this process are fugitive.
Process: D04Removal (to temporary storage prior to return to the process) of kiln dust produced by the spray tower generated during operation of process d03. Emissions are insignificant per 6 nycrr 201-6.3 (d) (7). Throughput information is not required to determine compliance. These emissions are fugitive.
Process: G01Equipment used (in case of emergency) to transfer kiln dust collected by the electrostatic precipitator to temporary storage prior to return to the process. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.
Process: G02 is located at MAIN, Building PRECIP - Operation of the pyroprocessing system with simultaneous operation of the raw mill. During this operation the raw feed is transformed into cement clinker through slow rotation of the kiln and the application of high temperature. The heat for the process is provided through the combustion of coal, natural gas, or compressor condensate generated on-site.
Process: G03 is located at MAIN, Building PRECIP - Operation of the pyroprocessing system without simultaneous operation of the raw mill. During this operation the raw feed is transformed into cement clinker through slow rotation of the kiln and the application of high temperature. The heat for the process is provided through the combustion of coal, natural gas, or compressor condensate generate on-site.
Process: J01Operation of clinker cooler in which hot cement clinker produced by the kiln is cooled

through the use of air movement.

Emission unit URAWGR - This emission unit consists of all operations and equipment involved in the production of raw feed for the pyroprocessing (kiln) system. Processes include the transfer, weighing, and mixing of raw materials, the formation of raw feed within the raw mill , and mixing/storage of various types of raw feeds. A number of processes within this emission unit have been deemed "insignificant" based on guidance contained in 6 NYCRR 201-6.3 (d) (7).
Emission unit URAWGR is associated with the following emission points (EP):
01009, PTRAW
It is further defined by the following process(es):
Process: C01Transfer, weighing, milling and blending of raw kiln feed and the raw materials from which it is produced. A portion of the emissions associated with this process are fugitive.

Emission unit UFINML - This emission unit consists of all operations and equipment involved in the finish grinding of cement clinker and other materials within the finish mill. Processes include the storage, transfer, and weighing of materials (clinker and other additives), grinding of the materials, and the transfer and storage of the finished product. A number of processes within this emission unit have been deemed "insignificant" based on guidance contained in 6 NYCRR 201-6.3 (d) (7).
Emission unit UFINML is associated with the following emission points (EP):
04031, 04032, 04210, 04230, 04250, 04270, 04290, 06245, 06255, 06990, 07000, 07010, 07020, 07333, PTBIN, PTMIL
It is further defined by the following process(es):
Process: M01Unloading of gypsum (or similar calcium sulfate-bearing materials) to a storage pile. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine emissions. These emissions are fugitive.
Process: M02Emissions associated with the gypsum (or other calcium sulfate-bearing material) storage pile. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.
Process: M03Emissions associated with the transfer of gypsum (or other calcium sulfate-bearing material) to a transfer hopper. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. The emissions from this process are fugitive.
Process: M04Unloading of marble (or similar calcium-bearing materials) to a storage pile. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. These emissions are fugitive.
Process: M05Emissions associated with the marble (or other calcium-bearing material) storage pile. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. The emissions associated wit h this process are fugitive.
Process: M06Emissions associated with the transfer of marble (or other calcium-bearing material) to a transfer hopper. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.
Process: M07Unloading of limestone (or similar calcium-bearing materials) to a storage pile. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. These emissions are fugitive.
Process: M08Emissions associated with the limestone (or other calcium-bearing material) storage pile.

Emissions from this process are insignificant per 6 nycrr 201-6.3(d)(7). Throughput information is not required to determine emissions. The emissions associated with this process are fugitive.
Process: M09Emissions associated with the transfer of limestone (or other calcium-bearing material) to a transfer hopper. Emission from this process are insignificant per 6 nycrr 201-6.3(d)(7). Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.
Process: M10Processes and equipment associated with the transfer of materials from the os belt to the os elevator. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. The emission s associated with this process are fugitive.
Process: M11Equipment and processes associated with transfer of materials within the crane bay. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. These emissions are fugitive.
Process: M12Equipment and processes associated with the transfer of materials to the finish mill storage bins. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.
Process: N13 is located at MAIN, Building FINISH - Equipment used to transfer raw materials and cement clinker to finish mill #1 and the operation of the mill itself. A portion of th emissions associated with this process are fugitive.
Process: N14Equipment used to transfer raw materials and cement clinker to finish mill #2 and the operation of the mill itself. A portion of the emissions associated with this process are fugitive.
Process: N15 is located at mAIN, Building FINISH - Proposed equipment used to trnasfer raw materials and cement to Finish Mill #3 and the operation of the mill itself.
Process: P01 is located at MAIN, Building STSILO - Equipment for transferring and storing (silos) finished product (cement) for bulk shipment.
Process: Q01 is located at MAIN, Building STSILO - Equipment for transferring and storing (silos) finished product (cement) for packaging.

Emission unit UCLTRN - This emission unit consists of all operations and equipment involved in the storage and transfer of cement clinker. Processes include material loading, unloading, indoor and outdoor storage and rail and truck loadout. A number of processes within this emission unit have been deemed "insignificant" based on guidance contained in 6 NYCRR 201-6.3 (d) (7).
Emission unit UCLTRN is associated with the following emission points (EP):
01118, 01119, 01123, 01811, 01812, 01830, 01910, 0K06A, 0K06B, 0K06C
It is further defined by the following process(es):
Process: K01 is located at MAIN, Building OFFSPC - Transfer and storage of cement clinker (silo 1 system).
Process: K02 is located at MAIN, Building OFFSPC - Transfer and storage of cement clinker (silo 2 system).
Process: K03Transfer of cement clinker to and from outdoor storage piles. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. These emissions are fugitive.
Process: K04Storage of cement clinker in outdoor piles. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information not required to determine emissions. These emissions are fugitive.
Process: K05 is located at MAIN, Building CLSILO - Equipment associated with the storage of cement

clinker in silos.
Process: K06 is located at Building CLSILO - Equipment for loadout of clinker by truck and rail.

Emission unit UPLYCM - This emission unit consists of all operations and equipment involved in the pre crushing of cement clinker prior to processing in the finish mill system. Processes include the transfer and weighing of the clinker and crushing. A number of processes with in this emission unit have been deemed "insignificant" based on guidance contained in 6 NYCRR 201-6.3 (d) (7).
Emission unit UPLYCM is associated with the following emission points (EP):
01904, 01905, 01906, 01936
It is further defined by the following process(es):
Process: L01 is located at MAIN, Building PLYCOM - Transfer, weighing, and crushing of cement clinker in the polycom crusher system. A portion of the emissions associated with this process are fugitive.
Process: L02Transfer of cement clinker (previously crushed by the polycom system) to storage. Emissions from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Througput information is not required to determine compliance. These emissions are fugitive.

Emission unit 0UFUEL - This emission unit consists of all operations and equipment involved in the storage, transfer, and preparation of coal (or other solid fuels) for use in the pyroprocessing (kiln) system. Processes include the loading, unloading, hauling, and storage of t he fuel and preparation of the fuel (by crushing) for use. Alternative fuels (when used) may also utilize the listed processes. A number of processes within this emission unit have been deemed "insignificant" based on guidance contained in 6 NYCRR 201-6 .3 (d) (7).
It is further defined by the following process(es):
Process: H01Loading, unloading, and hauling of coal (or other solid fuels). The fuel arrives on-site via trucks or rail cars. Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.
Process: H02Outdoor pile for the storage of coal or other solid fuels. Emission from this process are insignificant per 6 NYCRR 201-6.3(d)(7). Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.
Process: H03Loading, unloading, hauling, and preparation (crushing) of coal (or other solid fuels) prior to its use as a fuel in the kiln. Throughput information is not required to determine compliance. The emissions associated with this process are fugitive.

Title V/Major Source Status
GLENS FALLS LEHIGH CEMENT COMPANY is subject to Title V requirements. This determination is based on the following information:
This facility is major for the following permitted emissions:

CONTAMINANT	PERMITTED EMISSION RANGE
CO	>250 TPY
PM	>250 TPY
PM-10	>250 TPY
SO2	>250 TPY

NOx >250 TPY

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

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

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

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

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

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US

EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

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

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

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

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

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

Compliance Status

Facility is in compliance with all requirements

SIC Codes

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

SIC Code	Description
3241	CEMENT, HYDRAULIC

SCC Codes

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

SCC Code	Description
3-90-002-01	IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE CEMENT KILN/DRYER (BITUMINOUS COAL)
3-05-006-19	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Cement Load Out
3-05-006-18	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Cement Silos
3-05-006-14	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Clinker Cooler
3-05-006-17	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Clinker Grinding
3-05-006-15	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Clinker Piles
3-05-006-16	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Clinker Transfer
3-05-006-06	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Kilns
3-05-006-99	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Other Not Classified
3-05-006-09	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Primary Crushing
3-05-006-13	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Raw Material Grinding and Drying
3-05-006-08	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Raw Material Piles
3-05-006-12	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Raw Material Transfer
3-05-006-07	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Raw Material Unloading
3-05-320-32	MINERAL PRODUCTS STONE QUARRYING-PROCESSING (SEE ALSO 3-05-020 FOR DIFFERENT UNITS)

	TRUCK LOADING - CONVEYOR
3-05-020-06	MINERAL PRODUCTS STONE QUARRYING-PROCESSING (SEE ALSO 3-05-320 FOR DIFFERENT UNITS) Miscellaneous Operations: Screen/Convey/Handling

Facility Emissions Summary

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 250 tpy
0NY100-00-0	HAP		>= 10 tpy but < 25 tpy
007439-92-1	LEAD(HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 250 tpy
0NY075-00-5	PM-10		>= 250 tpy
007446-09-5	SULFUR DIOXIDE		>= 250 tpy
0NY998-00-0	VOC		>= 2.5 tpy 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.

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or

facilities.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state

that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures

adopted.

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

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

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

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

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

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

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

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

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

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

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

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

Item Z: **Visible Emissions Limited - 6 NYCRR Part 211.3**
Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Item AA: **Open Fires - 6 NYCRR Part 215**
No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Item BB: **Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action 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.

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

6NYCRR Part 201-6.5(g)
Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-2.1
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 there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

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

40CFR 52-A.
This is prevention of significant deterioration (PSD). This permit includes several permit conditions which are designed to meet the requirements of PSD. The facility has capped out of PSD.

40CFR 60-A.11
This regulation specifies the type of opacity monitoring requirements in relation to compliance with the New Source Performance Standards (NSPS) standards and maintenance requirements.

40CFR 60-A.13 (a)
This regulation specifies that all New Source Performance Standard (NSPS) affected sources that are required to have continuous monitoring systems (CMS) are subject to the requirements of Appendix B of 40 CFR Part 60 and if the CMS is used to demonstrate compliance with emission limits on a continuous basis, then it is also subject to Appendix F of 40 CFR Part 60.

40CFR 60-A.13 (d)
This regulation contains the requirements for daily drift testing for continuous monitoring systems required by 40 CFR Part 60.

40CFR 60-A.13 (e)
This regulation specifies minimum frequency of operation requirements for continuous monitoring systems required by 40 CFR Part 60.

40CFR 60-A.13 (h)
This regulation specifies the data averaging requirements for continuous monitoring systems subject to 40 CFR Part 60.

40CFR 60-A.4
This condition lists the USEPA Region 2 address for the submittal of all communications to the

"Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Enforcement and Compliance Assurance.

40CFR 60-A.7 (b)
This regulation 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 condition specifies the required information 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 condition 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)
This regulation contains the requirements for the completion date and reporting of Performance Testing (stack testing), at the facility.

40CFR 60-A.8 (b)
This regulation contains the requirements for Performance test methods and procedures, to be used by the owner or operator , of the affected facility.

40CFR 60-A.8 (c)
This condition contains the requirements for operating conditions, of the emission source, during performance testing.

40CFR 60-A.8 (d)
This regulation contains the requirements for advance notification of Performance (stack) testing.

40CFR 60-A.8 (e)
This regulation requires the facility to provide appropriate sampling ports, safe platforms and utilities as necessary for Performance (stack) testing.

40CFR 60-A.8 (f)
This regulation requires that Performance (stack) tests consist of three runs unless otherwise specified.

The rule also designates the allowable averaging methods for the analysis of the results.

40CFR 60-F.62
This regulation sets forth the particulate emissions standards for kilns and clinker coolers constructed or modified after 8/17/71.

40CFR 60-F.62 (a)
Any kiln subject to this rule may not emit particulate emissions in excess of 0.15 kg per metric ton of feed (dry basis) to the kiln (0.30 lb per ton) or exhibit an opacity greater than 20%.

40CFR 60-F.62 (c)
Any affected facility, other than the kiln or clinker cooler may not discharge any gases which exhibit a 10% opacity or greater.

40CFR 60-F.65
This regulation sets forth the recordkeeping and reporting requirements for the continuous opacity monitoring system(section (a)), visible emissions reports (section (b)), and malfunction reports (section (c)). Section (d) of this part also allows alternative means of compliance surveillance if approved by the State.

40CFR 63-LLL.1342
This Section contains a table (1) with applicability criteria, and emission and operating limits for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry.

40CFR 63-LLL.1343 (d)
This condition contains emission and operating limits for Hazardous Air Pollutants specific to area sources at Portland Cement Manufacturing Industries.

40CFR 63-LLL.1350 (i)
The owner or operator subject to dioxin and furan emission limits under this subpart shall inspect the components of the combustion system at least once per year.

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

6NYCRR 201-6.5 (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 202-1.3
This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may

include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. Alternate methods may be also be used provided they are determined to be acceptable by the department. Finally, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6NYCRR 202-1.5
This rule prohibits the concealment of an emission by the use of air or other gaseous diluents (diluting agents) to achieve compliance with an emission standard which is based on the concentration of a contaminant in the gases emitted through a stack.

6NYCRR 204-2.1
This condition states the submission requirements for the NOx Budget Trading Program. The Program is designed to mitigate the interstate transport of ground level ozone and nitrogen oxides, a ground level ozone precursor.

6NYCRR 204-4.1
This condition covers the compliance certification report requirements for the NOx Budget Program.

6NYCRR 204-7.1
This condition lists the requirements for transfer of allowances in the NOx Budget Program.

6NYCRR 204-8.1
This condition lists the general requirements for the NOx Budget trading program. They include, but are not limited to monitoring requirements, certification, record keeping and reporting.

6NYCRR 204-8.2
This condition covers the procedures for initially certifying and recertifying the monitoring systems of the unit meet the requirements of the NOx Budget Program

6NYCRR 204-8.3
This condition states the requirements for data substitution during times when the monitoring systems to not meet applicable quality assurance requirements.

6NYCRR 204-8.4
This condition lists the addresses where monitoring plans and their modifications, compliance certifications, recertifications, quarterly QA/QC reports and petitions for alternative monitoring shall be sent.

6NYCRR 204-8.7
This condition is a requirement for monitoring and reporting if a particular monitoring scenario is utilitzed.

6NYCRR 212 .3 (a)
This requires compliance with the degree of control specified in Tables 2, 3 and 4 for existing (on or before July 1, 1973) process emission sources.

6NYCRR 212 .3 (b)
This rule requires existing sources (in operation on or before 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 0.15 grains per dry standard cubic foot.

6NYCRR 212 .4 (a)
This 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 (c)
For new sources (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, emissions may not exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .9 (b)
This Table (2) specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental !, 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 220 .4 (c)
Corrective measures must be applied to any area, parking lot, clinker gallery, railcar loading shed, conveyor tunnel, access road, stockpile, building opening or refuse disposal area, at a portland cement plan that has the potential to emit visible emissions for one continuous hour or longer

6NYCRR 220 .4 (d)
No person will cause or allow emissions to the outdoor atmosphere that have an average six-minute opacity of 20 percent or more, except uncombined water, from any other confined processes at a portland cement plant.

6NYCRR 220 .6 (a)
A portland cement kiln may fire fuel which exceeds the fuel sulfur limitations of Part 225 provided it can be demonstrated that the resultant sulfur dioxide emissions that occur do not exceed the rate that would result through the use of fuels which meet the limits mandated by Part 225. (NOTE: This may be allowed because a certain amount of sulfur is retained in the clinker and is not emitted into the atmosphere)

6NYCRR 220 .6 (b) (1)
A compliance plan identifying reasonably available control technology (RACT) for NOx emissions from kilns must be submitted by 10/20/94. If the kiln(s) do not have RACT, a schedule for installation must be included in the plan. RACT must be implemented by 5/31/95.

6NYCRR 220 .8 (a)
Records of daily production rates, kiln feed rates, and any particulate emission measurements for any portland cement kiln or clinker cooler must be maintained on site for at least 3 years following acquisition of the data and be available for inspection. Production and feed rates should be summarized monthly.

6NYCRR 220 .8 (b)
A continuous opacity monitor must be installed, maintained and calibrated for any dry process cement kiln or any clinker cooler subject to the opacity requirements of this Part.

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 225-2.4 (a)
This regulation allows a source owner or operator to burn Waste Fuels A or B at their facility, provided the following information is submitted and is acceptable to the Department:

1. a demonstration that the emissions will not be above the ambient air quality standards
2. an analysis of the fuel to be burned is submitted and accepted by the Department
3. a demonstration of compliance with 40 CFR Part 761 regarding the PCB level in the fuel.

Compliance Certification
Summary of monitoring activities at GLENS FALLS LEHIGH CEMENT COMPANY:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
U-CLTRN/-/K06	record keeping/maintenance procedures	82
U-CLTRN/-/K06	record keeping/maintenance procedures	83
0-UKILN/01070	record keeping/maintenance procedures	59
0-UKILN/01122	record keeping/maintenance procedures	73
0-UKILN/01070	record keeping/maintenance procedures	60
0-UKILN/01122	record keeping/maintenance procedures	74
0-UKILN/01070	record keeping/maintenance procedures	61
0-UKILN/01122	record keeping/maintenance procedures	75
0-UKILN/01070	record keeping/maintenance procedures	62
0-UKILN/01122	record keeping/maintenance procedures	76
0-UKILN/01070	record keeping/maintenance procedures	56
0-UKILN/01122	record keeping/maintenance procedures	70
0-UKILN/01070	record keeping/maintenance procedures	57
0-UKILN/01122	record keeping/maintenance procedures	71
0-UKILN/01068	monitoring of process or control device parameters as surrogate	45
0-UKILN/01122	intermittent emission testing	77
U-CLTRN/01118	monitoring of process or control device parameters as surrogate	94
U-CLTRN/01119	monitoring of process or control device parameters as surrogate	97
U-CLTRN/01123	monitoring of process or control device parameters as surrogate	1-30
U-CLTRN/01811	monitoring of process or control device parameters as surrogate	102
U-CLTRN/01812	monitoring of process or control device parameters as surrogate	105
U-CLTRN/01910	monitoring of process or control device	108

	parameters as surrogate	
U-FINML/06990	monitoring of process or control device parameters as surrogate	139
U-FINML/07000	monitoring of process or control device parameters as surrogate	142
U-FINML/07010	monitoring of process or control device parameters as surrogate	145
U-FINML/07020	monitoring of process or control device parameters as surrogate	149
U-FINML/07333	monitoring of process or control device parameters as surrogate	153
U-PLYCM/01904	monitoring of process or control device parameters as surrogate	157
U-PLYCM/01905	monitoring of process or control device parameters as surrogate	160
U-PLYCM/01906	monitoring of process or control device parameters as surrogate	163
U-PLYCM/01936	monitoring of process or control device parameters as surrogate	166
U-SHPNG/-/P03	monitoring of process or control device parameters as surrogate	179
U-SHPNG/06049	monitoring of process or control device parameters as surrogate	187
U-SHPNG/06059	monitoring of process or control device parameters as surrogate	191
0-UKILN/01070	intermittent emission testing	63
0-UKILN/01070	monitoring of process or control device parameters as surrogate	64
0-UKILN/01122	monitoring of process or control device parameters as surrogate	78
U-CLTRN/-/K06	work practice involving specific operations	92
0-UKILN/01070	record keeping/maintenance procedures	65
0-UKILN/01122	record keeping/maintenance procedures	79
0-UKILN/-/G02	intermittent emission testing	1-9
0-UKILN/-/G03	intermittent emission testing	1-11
FACILITY	record keeping/maintenance procedures	1-3
FACILITY	record keeping/maintenance procedures	1-4
FACILITY	record keeping/maintenance procedures	34
0-UKILN/01070	record keeping/maintenance procedures	1-15
0-UKILN/01070	record keeping/maintenance procedures	1-21
0-UKILN/01070	record keeping/maintenance procedures	1-23
0-UKILN/01070	record keeping/maintenance procedures	1-24
U-CLTRN/01123	intermittent emission testing	1-29
U-FINML/04031	intermittent emission testing	1-31
U-FINML/04032	intermittent emission testing	1-32
U-FINML/06245	intermittent emission testing	1-33
U-FINML/06255	intermittent emission testing	1-34
U-QUARY/00902	intermittent emission testing	1-35
U-QUARY/00913	intermittent emission testing	1-36
U-RAWGR/01009	intermittent emission testing	1-37
U-RMHND/01033	intermittent emission testing	1-38
U-SHPNG/06000	intermittent emission testing	1-39
U-SHPNG/06304	intermittent emission testing	1-40
U-SHPNG/06305	intermittent emission testing	1-41
U-SHPNG/06340	intermittent emission testing	1-42
U-SHPNG/06375	intermittent emission testing	1-43
U-SHPNG/06695	intermittent emission testing	1-44
U-SHPNG/07200	intermittent emission testing	1-45
U-CLTRN/-/K06	intermittent emission testing	81
U-CLTRN/01118	intermittent emission testing	93
U-CLTRN/01119	intermittent emission testing	95
U-CLTRN/01811	intermittent emission testing	100

U-CLTRN/01812	intermittent emission testing	103
U-CLTRN/01910	intermittent emission testing	106
U-FINML/06990	intermittent emission testing	138
U-FINML/07000	intermittent emission testing	141
U-FINML/07010	intermittent emission testing	144
U-FINML/07020	intermittent emission testing	147
U-FINML/07333	intermittent emission testing	151
U-PLYCM/01904	intermittent emission testing	155
U-PLYCM/01905	intermittent emission testing	158
U-PLYCM/01906	intermittent emission testing	161
U-PLYCM/01936	intermittent emission testing	164
U-SHPNG/-/P03	intermittent emission testing	178
U-SHPNG/06049	intermittent emission testing	185
U-SHPNG/06059	intermittent emission testing	189
U-SHPNG/06302	intermittent emission testing	193
U-SHPNG/06303	intermittent emission testing	195
U-CLTRN/01119	intermittent emission testing	96
U-CLTRN/01811	intermittent emission testing	101
U-CLTRN/01812	intermittent emission testing	104
U-CLTRN/01910	intermittent emission testing	107
U-FINML/04031	intermittent emission testing	123
U-FINML/04032	intermittent emission testing	127
U-FINML/06245	intermittent emission testing	131
U-FINML/06255	intermittent emission testing	135
U-FINML/07020	intermittent emission testing	148
U-FINML/07333	intermittent emission testing	152
U-PLYCM/01904	intermittent emission testing	156
U-PLYCM/01905	intermittent emission testing	159
U-PLYCM/01906	intermittent emission testing	162
U-PLYCM/01936	intermittent emission testing	165
U-QUARY/00913	intermittent emission testing	171
U-RAWGR	intermittent emission testing	173
U-SHPNG/-/Q02	intermittent emission testing	180
U-SHPNG/06000	intermittent emission testing	183
U-SHPNG/06049	intermittent emission testing	186
U-SHPNG/06059	intermittent emission testing	190
U-SHPNG/06375	intermittent emission testing	204
U-SHPNG/06695	intermittent emission testing	207
U-FINML/04031	intermittent emission testing	124
U-FINML/04032	intermittent emission testing	128
U-FINML/06245	intermittent emission testing	132
U-FINML/06255	intermittent emission testing	136
U-QUARY/00902	intermittent emission testing	169
U-RAWGR	intermittent emission testing	174
0-UKILN/01070	continuous emission monitoring (cem)	1-25
0-UKILN/01070	record keeping/maintenance procedures	48
0-UKILN/01122	record keeping/maintenance procedures	66
FACILITY	work practice involving specific operations	1-5
FACILITY	work practice involving specific operations	1-6
FACILITY	work practice involving specific operations	1-7
0-UKILN/01070	monitoring of process or control device parameters as surrogate	1-26

Basis for Monitoring

Conditions # 45, 94, 97, 102, 105, 108, 139, 142, 145, 149, 153, 157, 160, 163, 166, 179, 187 and 191:
-40 CFR 60.62, NSPS Subpart F - These conditions specify the requirements under NSPS for Cement Plants concerning opacity for all cement manufacturing equipment other than the kiln or clinker cooler. This condition sets the limit at 10 % opacity.

Condition # 47: -6NYCRR 220.6(b)(1) - The NOx RACT limit was established under the terms of the Consent Order file No. D5-0001-97-06.

Condition # 53: - 6NYCRR 225-2.4(a) -- The on-site generated compressor condensate has been determined to meet all requirements of a Wast Fuel Type A except the minimum gross heat content. It has been determined that the allowed feed rate of this material to the kiln is not sufficient to have any affect on the combustion efficiency of the kiln. Therefore, this material is being permitted at the prescribed maximum feed rate, as a Waste Fuel Type A.

Condition # 77: -40 CFR 60.62, NSPS Subpart F - This condition specifies the requirements under NSPS for Cement Plants concerning particulate matter from the clinker cooler. This condition sets the limit at 0.1 pounds per ton of clinker.

Conditions # 81, 93, 95, 100, 103, 106, 138, 141, 144, 147, 151, 155, 158, 161, 164, 178, 185, 189, 193 and 195: - 6NYCRR 212.4(c) -- These conditions require all affected sources to meet the emission limit of 0.05 grains of particulate per dry standard cubic foot of exhaust gas.

Condition # 82: - 40CFR 52, Subpart A -- This condition requires the facility to meet the emission limit of 0.96 pounds per hour for PM-10 in order to meet the limits imposed due to Subpart A of 40CFR 52, for all of their baghouses on emission point 0K06A through 0K06C clinker loading processes. under emission unit U-CLTRN for the time period between 01/02/2001 and 01/01/2006. A yearly emission limit of 14.63 tons is required. The facility is required to do monthly testing using Method 22 and Method 9 of Appendix A to 40CFR 60. All test results must be included in semi-annual reports to the Department.

Condition # 83: - 40CFR 52, Subpart A -- This condition requires the facility to meet the emission limit of 2.83 pounds per hour for Total Particulates in order to meet the limits imposed due to Subpart A of 40CFR 52, for all of their baghouses on emission point 0K06A through 0K06C clinker loading processes. under emission unit U-CLTRN for the time period between 01/02/2001 and 01/01/2006. A yearly emission limit of 24.39 tons is required. The facility is required to do monthly testing using Method 22 and Method 9 of Appendix A to 40CFR 60. All test results must be included in semi-annual reports to the Department.

Conditions # 92 & 1-30: - 40CFR 60.62(c), Subpart F -- These conditions require the facility to meet the opacity limit of 10% per Method 9 for all affected sources included in emission unit U-CLTRN.

Conditions # 96, 101. 104, 107, 123, 127, 131, 135, 148, 152, 156, 162, 165, 171, 173, 180, 183, 186, 190, 204 and 207: -6NYCRR 212.9(b) -- These conditions require the facility to meet the degree of air cleaning required by Table 2 of 212.9(b).

Condition # 1-(31 thru 45): -6NYCRR 212.3(b) -- These conditions require all affected sources to meet the emission limit of 0.15 grains of particulate per dry standard cubic foot of exhaust gas.

Conditions # 124, 128, 132, 136, 169 and 174 -6NYCRR 220.4(d) - These conditions require the facility to meet an opacity limit of 20% for all affected sources.