



Permit Review Report

Permit ID: 6-9906-00006/00076
11/12/2008

Facility Identification Data

Name: FORT DRUM - US MILITARY
Address: HQ, 10TH MTN DIV (LI)

Owner/Firm

Name: U S DEPT OF THE ARMY
Address: THE PENTAGON
WASHINGTON, DC 20310, USA
Owner Classification: Federal

Permit Contacts

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Air Permitting Contact:
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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.

Summary Description of Proposed Project

Initial Title V permit application for existing operations that support U.S. Army Fort Drum's training and planning activities. Recent addition of sources that are exempt from permitting has made the facility major. This application is representative of current operations.

Attainment Status

FORT DRUM - US MILITARY is located in the town of ANTWERP in the county of JEFFERSON. The attainment status for this location is provided below. (Areas classified as attainment



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are those that meet all ambient air quality standards for a designated criteria air pollutant.)

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

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

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

Facility Description

Army installation with the mission of commanding the active component units and individuals assigned to the installation; providing support to all units in training to include active and reserve components for all services; and planning and supporting mobilization and training of troops.

Permit Structure and Description of Operations

The Title V permit for FORT DRUM - US MILITARY 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



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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.

FORT DRUM - US MILITARY is defined by the following emission unit(s):

Emission unit U4530P - This emission unit consists of a paint booth with dry arrestor type filters. It is used primarily for painting vehicles and vehicle parts.

Emission unit U4530P is associated with the following emission points (EP):
STK02

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

Process: 002 is located at Main, Building 4530 - Emissions from the operation of a spray paint booth that coats vehicles and vehicle components.

Emission unit U11005 - Three 10,000 gallon underground storage tanks (UST) equipped with Stage I submerged loading using dedicated vapor balance and Stage II vapor recovery systems at the fuel dispensing pumps. This facility dispenses motor gasoline to vehicles at the Army and Air Force Exchange Service (AAFES), Building 11005.

Emission unit U11005 is associated with the following emission points (EP):
STK09, STK10, STK11

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

Process: 011 is located at AAFES, Building 11005 - Underground storage tanks filled using submerged loading with a balanced Stage I vapor recovery system.

Process: 012 is located at AAFES, Building 11005 - Emissions resulting from underground storage tank breathing losses.

Process: 013 is located at AAFES, Building 11005 - Motor vehicles are refueled at the dispensing pumps. Fugitive vapors are collected by a Stage II vapor recovery system and returned to the storage tanks.

Process: 014 is located at AAFES, Building 11005 - Emission resulting from fuel spillage.

Emission unit U1490G - Two 40,000 gallon underground storage tanks (UST) equipped with Stage I submerged loading using dedicated vapor balance and Stage II vapor recovery systems at the fuel dispensing pumps. This facility dispenses motor gasoline to vehicles at the Petroleum, Oil, and Lubricants (POL) Yard, Building 1490.

Emission unit U1490G is associated with the following emission points (EP):
STK12, STK13

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

Process: 015 is located at POL, Building 1490 - Underground storage tanks filled using submerged loading with a balanced Stage I vapor recovery system.

Process: 016 is located at POL, Building 1490 - Emissions resulting from underground storage tank breathing losses.

Process: 017 is located at POL, Building 1490 - Motor vehicles are refueled at the dispensing pumps. Fugitive vapors are collected by a Stage II vapor recovery system and returned to the storage tanks.

Process: 018 is located at POL, Building 1490 - Emissions resulting from fuel spillage.

Emission unit U2050P - This emission unit consists of a goldenwest truck T-64 paint booth with one exhaust stack. This booth is used to paint aerospace components and is equipped with dry arrestor type filters.

Emission unit U2050P is associated with the following emission points (EP):
STK01

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

Process: 001 is located at Main, Building 2050 - Emissions from the operation of a spray paint booth coating aerospace components.

Emission unit U2140G - This emission unit consists of 3 underground storage tanks (UST) of 4,000, 6,000, and



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10,000 gallons which are equipped with Stage I submerged loading using dedicated vapor balance and Stage II vapor recovery systems at the refuelling pumps. This facility dispenses motor gasoline to vehicles at the Army and Air Force Exchange Service (AAFES) Building 2140.

Emission unit U2140G is associated with the following emission points (EP):

STK03, STK04, STK05

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

Process: 003 is located at AAFES, Building 2140 - Underground storage tanks filled using submerged loading with a balanced Stage I recovery system.

Process: 004 is located at AAFES, Building 2140 - Emissions resulting from underground storage tank breathing losses.

Process: 005 is located at AAFES, Building 2140 - Motor vehicles are refueled at the dispensing pumps. Fugitive vapors are collected by a Stage II vapor collection system and returned to the storage tanks.

Process: 006 is located at AAFES, Building 2140 - Emissions resulting from fuel spillage.

Emission unit U4230G - Three 10,000 gallon underground storage tanks (UST) equipped with Stage I submerged loading using dedicated vapor balance and Stage II vapor recovery systems at the fuel dispensing pumps. This facility dispenses motor gasoline to vehicles at the Army and Air Force Exchange Service (AAFES), Building 4230.

Emission unit U4230G is associated with the following emission points (EP):

STK06, STK07, STK08

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

Process: 007 is located at AAFES, Building 4230 - Underground storage tanks filled using submerged loading with a balanced Stage I vapor recovery system.

Process: 008 is located at AAFES, Building 4230 - Emissions resulting from underground storage tank breathing losses.

Process: 009 is located at AAFES, Building 4230 - Motor vehicles are refueled at the dispensing pumps. Fugitive vapors are collected by a Stage II vapor recovery system and returned to the storage tanks.

Process: 010 is located at AAFES, Building 4230 - Emission resulting from fuel spillage.

Title V/Major Source Status

FORT DRUM - US MILITARY is subject to Title V requirements. This determination is based on the following information:

Fort Drum is considered a major facility for the purposes of Title V permitting because the facility has the potential to be a major source of volatile organic compounds (VOC), oxides of nitrogen (NOx), sulfur dioxide (SO2), and carbon monoxide (CO).

Program Applicability

The following chart summarizes the applicability of FORT DRUM - US MILITARY 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)	NO



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NSPS	NO
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)

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.



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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
9711	NATIONAL SECURITY

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
4-02-999-95	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS Specify in Comments Field
4-04-004-05	BULK TERMINALS/PLANTS BULK TERMINALS/PLANTS FOR PETROLEUM PRODUCTS - UNDERGROUND TANKS
4-06-001-37	Gasoline RVP 7: Breathing Loss TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TANK CARS AND TRUCKS
4-06-001-41	CRUDE OIL: SPLASH LOADING (NORMAL SERVICE) TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TANK CARS AND TRUCKS
4-06-004-02	GASOLINE: SUBMERGED LOADING (BALANCED SERVICE) TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS FILLING VEHICLE GAS TANKS - STAGE II
4-06-004-03	Liquid Spill Loss w/o Controls TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS FILLING VEHICLE GAS TANKS - STAGE II



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4-06-006-03

Vapor Loss w/o Controls
 TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS
 CONSUMER (CORPORATE) FLEET REFUELING - STAGE II
 VAPOR LOSS W/CONTROLS

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 of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE		> 0 but < 10 tpy
008006-61-9	GASOLINE		>= 50 tpy but < 100 tpy
068606-21-3	GLYCOLS, C10-16		> 0 but < 2.5 tpy
0NY100-00-0	HAP	48000	
007439-92-1	LEAD		> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 25 tpy but < 40 tpy
0NY075-00-5	PM-10		>= 25 tpy but < 40 tpy
007446-09-5	SULFUR DIOXIDE		>= 250 tpy
000108-88-3	TOLUENE		> 0 but < 10 tpy
0NY998-00-0	VOC		>= 100 tpy but < 250 tpy
001330-20-7	XYLENE, M, O & P MIXT.		> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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



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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 B: 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 C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part

201-6.3(a)(4)

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

Item D: Certification by a Responsible Official - 6 NYCRR Part

201-6.3(d)(12)

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

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part

201-6.5(a)(2)

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

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

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

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 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 H: 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 I: Severability - 6 NYCRR Part 201-6.5(a)(9)

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

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

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



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are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged



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to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)
 All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.
NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5
 Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

Regulatory Analysis

Location Short Description Facility/EU/EP/Process/ES	Regulation	Condition
FACILITY Powers and Duties of the		Department with respect to air pollution control
FACILITY Subpart GG - Aerospace	40CFR 63-GG	
FACILITY Reciprocating Internal	40CFR 63-GGGGG	Manufacturing NESHAP
FACILITY Chemical accident	40CFR 63-ZZZZ	Combustion Engines NESHAP
FACILITY Protection of	40CFR 68	prevention provisions
	40CFR 82-F	Stratospheric Ozone - recycling and emissions reduction

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FACILITY	6NYCRR 200.6	
	Acceptable ambient air	quality.
FACILITY	6NYCRR 200.7	
FACILITY	6NYCRR 201-1.4	
	Unavoidable noncompliance	and violations
FACILITY	6NYCRR 201-1.7	
FACILITY	6NYCRR 201-1.8	
	Prohibition of	reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	
	Exempt Activities - Proof	of eligibility
FACILITY	6NYCRR 201-3.3 (a)	
	Trivial Activities -	proof of eligibility
FACILITY	6NYCRR 201-6	
	Title V Permits and the	Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	
FACILITY	6NYCRR 201-6.5 (a) (7)	
FACILITY	6NYCRR 201-6.5 (a) (8)	
FACILITY	6NYCRR 201-6.5 (c)	
	Permit conditions for	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	
	Permit conditions for	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	
	Permit conditions for	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	
FACILITY	6NYCRR 201-6.5 (e)	
FACILITY	6NYCRR 201-6.5 (f)	
FACILITY	6NYCRR 201-6.5 (f) (6)	

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FACILITY	6NYCRR 201-7.2	
	Emissions capping using	synthetic minor permits
FACILITY	6NYCRR 202-1.1	
FACILITY	6NYCRR 202-2.1	
	Emission Statements -	Applicability
FACILITY	6NYCRR 202-2.5	
	Emission Statements -	record keeping requirements.
FACILITY	6NYCRR 211.2	
	General Prohibitions -	air pollution prohibited.
FACILITY	6NYCRR 211.3	
	General Prohibitions -	visible emissions limited
FACILITY	6NYCRR 215	
FACILITY	6NYCRR 225-1.2 (a) (2)	
	Sulfur in Fuel	Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.8 (a)	
	Reports, sampling and	analysis.
FACILITY	6NYCRR 225-1.8 (d)	
	Reports, sampling, and	analysis
FACILITY	6NYCRR 225-3.4 (c)	
	Gasoline record keeping	requirements for retail or wholesale purchases - consumers
FACILITY	6NYCRR 225-3.4 (d)	
	Maintenance and	availability of gasoline records
FACILITY	6NYCRR 226	
	SOLVENT METAL CLEANING	PROCESSES
FACILITY	6NYCRR 227-1.3 (a)	
	Smoke Emission	Limitations.
FACILITY	6NYCRR 227-1.6 (a)	
FACILITY	6NYCRR 227-1.6 (b)	
	Corrective Action:	Facility Shutdown.
FACILITY	6NYCRR 227-1.6 (c)	
	Corrective Action:	Facility Shutdown

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FACILITY	6NYCRR 227-1.6 (d)	Prohibitions.
	Corrective Action:	
FACILITY	6NYCRR 227-1.7 (a)	Facility Shutdown Prohibitions.
FACILITY	6NYCRR 227-1.7 (b)	
U-2050P	6NYCRR 228.1 (d)	
U-4530P	6NYCRR 228.1 (d)	
FACILITY	6NYCRR 228.1 (e) (13)	
	Low-use specialty-type	
FACILITY	6NYCRR 228.10	operation non-applicability
	Handling, storage and	
FACILITY	6NYCRR 228.2 (b) (35)	disposal of VOCs
	Formula for Maximum	
U-4530P/-/002/00103	6NYCRR 228.3 (f)	permitted VOC content
	Mobile Equipment repair	
FACILITY	6NYCRR 228.4	and refinishing or color-matched coatings.
FACILITY	6NYCRR 228.5 (a)	
	VOC recordkeeping by the	
FACILITY	6NYCRR 228.5 (b)	facility
FACILITY	6NYCRR 228.5 (c)	
	Alternate sampling and	
FACILITY	6NYCRR 228.5 (d)	analysis methods
	Department Access to	
FACILITY	6NYCRR 228.5 (j)	Obtain Samples
FACILITY	6NYCRR 228.5 (k)	
	Records maintained for	
U-2050P/-/001	6NYCRR 228.8	five years
U-4530P/-/002	6NYCRR 228.8	
U-11005/-/011	6NYCRR 230.2 (a) (1)	
FACILITY	6NYCRR 230.2 (f)	

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FACILITY	6NYCRR 230.2(f)(6)	
FACILITY	6NYCRR 230.2(g)	
FACILITY	6NYCRR 230.2(h)	
FACILITY	6NYCRR 230.2(i)	
FACILITY	6NYCRR 230.2(j)	
FACILITY	6NYCRR 230.2(k)(2)(i)	
FACILITY	6NYCRR 230.2(k)(2)(ii)	
FACILITY	6NYCRR 230.2(k)(2)(iii)	
FACILITY	6NYCRR 230.5(a)	
	Gasoline Dispensing Sites	
FACILITY	6NYCRR 230.5(c)	- Recordkeeping and Reporting.
	Gasoline dispensing sites	
FACILITY	6NYCRR 230.5(d)	- recordkeeping and reporting.
	Gasoline dispensing sites	
		- recordkeeping and reporting.

Applicability Discussion:

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

ECL 19-301.

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

6NYCRR Part 200-.6

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

6NYCRR Part 200-.7

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



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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 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-6

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 201-6.5(a)(4)

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



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permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

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

6NYCRR 201-6.5(a)(8)

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

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)(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(d)(5)

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

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 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of



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the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 202-1.1

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

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.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

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.

40 CFR Part 82, Subpart F

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



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Facility Specific Requirements

In addition to Title V, FORT DRUM - US MILITARY has been determined to be subject to the following regulations:

40CFR 63-GG

This rule requires controls on processes within an aerospace manufacturing and rework facility that release air toxics, many of which are also VOCs; these processes include cleaning operations, primer operations, topcoat operations, depainting operations, and chemical milling maskant operations.

Fort Drum has accepted limits on HAP emissions making the facility a minor source of HAPs and as such the requirements of 40 CFR 63 Subpart GG do not apply.

40CFR 63-GGGGG

Site remediation involves the removal of hazardous substances from contaminated media (soil or groundwater), removal of the contaminated media itself, or removal of the hazardous substances by themselves. Site remediation can be conducted at industrial facilities such as chemical manufacturing facilities, petroleum refineries, and metal finishers; government facilities such as military installations; and other facilities.

This regulation requires emissions controls and/or requirements for work practices for three groups of emission points: process vents, remediation material management units (tanks, containers, surface impoundments, oil/water separators, organic/water separators, drain systems) and equipment leaks.

Fort Drum has accepted limits on HAP emissions making the facility a minor source of HAPs and as such the requirements of 40 CFR 63 Subpart GGGGG do not apply.

40CFR 63-ZZZZ

This rule requires the reduction in toxic air emissions from stationary reciprocating internal combustion engines (RICE). These requirements apply to RICE used at facilities such as pipeline compressor stations, chemical and manufacturing plants, and power plants.

Fort Drum has accepted limits on HAP emissions making the facility a minor source of HAPs and as such the requirements of 40 CFR 63 Subpart ZZZZ do not apply.

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 201-7.2

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

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 225-1.8 (a)

Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years



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6NYCRR 225-1.8 (d)

This requires that sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the commissioner.

6NYCRR 225-3.4 (c)

This regulation sets forth the requirements for records to be maintained on each delivery of gasoline to the facility. The records will include a certification that the gasoline conforms with applicable Reid vapor pressure (RVP) and oxygen content as specified in 225-3, documentation of maximum RVP of the gasoline, time periods when the gasoline is intended to be dispensed and the shipment quantity.

6NYCRR 225-3.4 (d)

This regulation requires the facility to maintain records that may be required under 6 NYCRR Part 225-3.4(a), (b) or (c). These records must be made available to the commissioner or his or her representative, for inspection during normal business hours, at the location from which the gasoline was delivered, sold, or dispensed.

6NYCRR 226

This regulation specifies the general requirements, equipment specifications and operating requirements for open-top vapor, conveyorized and cold cleaning degreasers.

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 227-1.6 (a)

This regulation requires that any facility found in violation of the provisions of Part 227 must not operate the affected stationary combustion installation that is in violation unless it is equipped with approved emission control equipment, it is rehabilitated or upgraded in an approved manner; or the fuel is changed to an acceptable type

6NYCRR 227-1.6 (b)

This regulation states that the Department may seal the affected stationary combustion installation that does not comply with the provisions in subdivision 6 NYCRR 227-1.6(a) within the time provided.

6NYCRR 227-1.6 (c)

This regulation state that no person may operate any affected stationary combustion installation sealed by the commissioner in accordance with this Part 227.

6NYCRR 227-1.6 (d)

This regulation states that no person except Department personnel may remove, tamper with, or destroy any seal affixed to any affected stationary combustion installation.

6NYCRR 227-1.7 (a)

This regulation requires any stationary combustion installation described in section 6 NYCRR 227-1.2 of this Part, to provide pertinent emissions data upon request by the Department..

6NYCRR 227-1.7 (b)

This specifies the requirement for acceptable fuel sample test methods.

6NYCRR 228 .1 (d)

This citation states that any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228, will remain subject to these provisions even if the annual potential to emit volatile organic compounds for the



facility later falls below the thresholds set forth in this regulation.

6NYCRR 228 .1 (e) (13)

The requirements of 6 NYCRR Part 228 do not apply to low-use surface coatings used for intermittent or specialty-type operations, where the combined facility-wide total usage is 55 gallons or less on a 12-month rolling basis. Records of low-use surface coatings usage must be maintained on an as used basis in a format acceptable to the department in accordance with the recordkeeping provisions of section 228.5 of this Part. Motor vehicles refinishing coating lines may qualify for this exemption prior to January 1, 2005. Beginning January 1, 2005, mobile equipment repair and refinishing or color matched coating lines will not qualify for this exemption.

6NYCRR 228 .10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6NYCRR 228 .2 (b) (35)

This citation specifies the formula used to calculate the maximum permitted pounds of volatile organic compound per gallon of coating specified in tables 1 and 2 of 6 NYCRR Part 228.

6NYCRR 228 .3 (f)

This citation specifies the requirements for applying any automotive pretreatment primer, automotive primer-surfacer, automotive primer-sealer, automotive topcoat or automotive specialty coatings to mobile equipment or mobile equipment components that contain volatile organic compounds.

6NYCRR 228 .4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6NYCRR 228 .5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacture which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6NYCRR 228 .5 (b)

This citation requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.



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6NYCRR 228 .5 (c)

This citation allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

6NYCRR 228 .5 (d)

This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6NYCRR 228 .5 (j)

This requires any information or record showing noncompliance with the requirements of Part 228 to be reported to Department within 30 days of generation of the information or record..

6NYCRR 228 .5 (k)

This requires all records required by this regulation to be maintained at the facility for a period of five years

6NYCRR 228 .8

Table 2 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6NYCRR 230 .2 (a) (1)

This provision requires the gasoline storage tank to be equipped with vapory recovery equipment between the tank and truck.

6NYCRR 230 .2 (f)

Owners and/or operators of gasoline storage tanks, vehicles, and dispensing stations required to install stage 1 and/or stage 2 vapor recovery equipment must meet these provisions. The provisions include training , correct operation, replacement, and repair of personnel and equipment.

6NYCRR 230 .2 (f) (6)

Owners and/or operators of gasoline storage tanks, gasoline transport vehicles and gasoline dispensing sites subject to stage I and/or stage II vapor collection or vapor control system requirements must,with respect to stage II vapor collection systems, conspicuously post operating instructions for the system on each dispenser which include:

- (i) a clear description of how to correctly dispense gasoline with the vapor recovery nozzles utilized at the site;
- (ii) a warning that continued attempts at dispensing gasoline after the system indicates that the vehicle tank is full may result in spillage or recirculation of gasoline; and
- (iii) the telephone number established by the department for use by the public to report problems experienced with the stage II vapor recovery systems in that county.

6NYCRR 230 .2 (g)

This regulation requires daily visual inspections of components of stage II vapor collection system to ensure the integrity and efficiency of the system. Dispensers with defective stage II components must be removed from service, locked and sealed to prevent vapor loss from operational dispensers until approved replacement parts are installed. A log will be kept recording the results of the inspections.



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6NYCRR 230 .2 (h)

The modification, removal, replacement or addition of any element which would render the stage II vapor collection system inoperative or impair its integrity and efficiency is prohibited.

6NYCRR 230 .2 (i)

Any owner or operator of a gasoline-dispensing site which is not regulated by this Part must comply with all other applicable Parts of this Subchapter. Certification of a stage II vapor collection system by the department does not relieve the owner and/or operator of the responsibility to comply with other applicable codes and regulations pertaining to fire prevention, weights and measures and safety matters.

6NYCRR 230 .2 (j)

Stage II systems must be constructed and maintained to prevent accumulations of liquids which block vapor return lines. Underground vapor lines must be sloped from the dispensers to the underground storage tanks or equipped with a condensate trap to allow liquid to accumulate without blocking the vapor return line. All vapor return line condensate traps must be accessible and must be emptied periodically to prevent blockage.

6NYCRR 230 .2 (k) (2) (i)

Owners and/or operators of stage II systems must perform dynamic back pressure tests at five year intervals after commencing operation. Back pressure during dynamic back pressure tests must not exceed 0.45 inches of water column gauge at a flow rate of 60 cubic feet per hour or 0.95 inches of water column gauge at a flow rate of 100 cubic feet per hour.

6NYCRR 230 .2 (k) (2) (ii)

Owners and/or operators of stage II systems must perform liquid blockage tests at five year intervals after commencing operation. Back pressure during liquid blockage tests must not exceed 0.03 inches of water column gauge above the dynamic back pressure test results for the system for flow rates of 60 and 100 cubic feet per hour.

6NYCRR 230 .2 (k) (2) (iii)

Owners and/or operators of stage II systems must perform leak tests at five year intervals after commencing operation. Pressure in gasoline storage tanks must not fall below the values in Table 1 after five minutes from an initial pressure of 10.0 inches of water column during the leak test.

6NYCRR 230 .5 (a)

This section requires record keeping of delivered fuel which must be maintained for two years.

6NYCRR 230 .5 (c)

This regulation requires a gasoline dispensing site to post their copy of the registration form obtained from the NYSDEC.

6NYCRR 230 .5 (d)

This regulation requires the owner or operators of gasoline dispensing sites that are required to perform tests of the Stage II systems to submit the results of these tests to the Department within 30 days of the test. Copies of the test results must be maintained at the dispensing location as well.

Compliance Certification



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Summary of monitoring activities at FORT DRUM - US MILITARY:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	28	work practice involving specific operations
FACILITY	29	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures
FACILITY	34	monitoring of process or control device parameters as surrogate
FACILITY	41	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
U-4530P/-/002/00103	80	record keeping/maintenance procedures
FACILITY	43	monitoring of process or control device parameters as surrogate
FACILITY	44	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
FACILITY	48	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
U-2050P/-/001	68	work practice involving specific operations
U-2050P/-/001	69	work practice involving specific operations
U-2050P/-/001	70	work practice involving specific operations
U-4530P/-/002	72	work practice involving specific operations
U-4530P/-/002	73	work practice involving specific operations
U-4530P/-/002	74	work practice involving specific operations
U-4530P/-/002	75	work practice involving specific operations
U-4530P/-/002	76	work practice involving specific operations
U-4530P/-/002	77	work practice involving specific operations
U-4530P/-/002	78	work practice involving



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U-4530P/-/002	79	specific operations work practice involving
FACILITY	51	specific operations record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	monitoring of process or control device parameters as surrogate
FACILITY	58	monitoring of process or control device parameters as surrogate
FACILITY	59	monitoring of process or control device parameters as surrogate
FACILITY	60	monitoring of process or control device parameters as surrogate
FACILITY	61	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures

Basis for Monitoring

- 1) 6 NYCRR Part 201-6.5(c)(3)(ii): This facility is a major source as defined in 6 NYCRR Part 201-2. Any facility that receives a Title V permit is required to make a semi-annual monitoring report.
- 2) 6 NYCRR Part 201-6.5(e): This facility is a major source as defined in 6 NYCRR Part 201-2. Any facility that receives a Title V permit is required to submit an annual compliance certification.
- 3) 6 NYCRR Part 201-6.5(f): This condition outlines a protocol for operational flexibility at the facility. In particular it specifies what types of changes are allowed to occur at the facility without modifying the Title V permit and the process that the facility must follow in order to document changes made under the operational flexibility protocol.
- 4) 6 NYCRR Part 201-7.2(c): This facility has accepted limitations on emissions of hazardous air pollutants (HAP) that cap its potential to emit (PTE) to less than 9 tons per year (tpy) for any individual HAP and less than 25 tons per year for the total of all HAP. Therefore, the facility is considered a minor source of HAP and the following National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply: 40 CFR 63 Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities; 40 CFR 63 Subpart GGGGG - National Emission Standards for Site Remediation; and 40 CFR 63 Subpart ZZZZ - National Emission Standards for Reciprocating Internal Combustion Engines.
- 5) 6 NYCRR Part 202-2.1: Any facility issued a Title V permit must submit an annual emission statement by April 15th every year.
- 6) 6 NYCRR Part 225-1.2(a)(2): This facility has hundreds of exempt boilers capable of burning fuel oil. All fuel oil burned at this facility must contain 1.5% sulfur by weight, or less.
- 7) 6 NYCRR Part 225-1.8(a): This facility burns fuel oil and must maintain records of the quantity and physical characteristics of all fuel oil burned at the facility.
- 8) 6 NYCRR Part 225-3.4: This facility accepts and dispenses gasoline at various locations and must maintain records to demonstrate the gasoline conforms to all Reid vapor pressure (RVP) and oxygen requirements of 6 NYCRR Part 225-3. Facility must also maintain records of all gasoline received, sold, or dispensed at the facility.



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9) 6 NYCRR Part 226: This facility operates numerous cold cleaning degreasing apparatus. All such degreasing equipment must be operated and maintained as specified in 6 NYCRR Part 226. Additionally facility must maintain records of all cleaning solvents used and their composition.

10) 6 NYCRR Part 227-1.3(a): All exempt combustion sources at this facility must meet the 20% opacity limit contained in this rule. Visible emissions observations for exempt combustion sources will be performed at the request of the Department.

11) 6 NYCRR Part 228.1(e)(13): This facility can consider certain surface coatings as low-use coatings as long as the combined facility-wide usage is 55 gallons or less during any 12 month period. The facility must maintain records to demonstrate compliance with this option. Such low-use specialty coatings are not required to meet the VOC RACT requirements of 6 NYCRR Part 228.

12) 6 NYCRR Part 228.1(d); 228.2(b)(35); 228.4; 228.5(a), (b), (c), (f), (j) & (k); 228.8 and 228.10: This facility has a VOC PTE > 50 tpy and coats aerospace components at emission unit U-2050P and performs mobile equipment repair and refinishing at emission unit U-4530P. The facility also prepares and handles surface coatings at these two emission units. Therefore, the VOC RACT requirements and all other emission limits, monitoring, recordkeeping and reporting requirements of 6 NYCRR Part 228 apply to the surface coating operations of these two emission units.

13) 6 NYCRR Part 230.2(f), (g), (h), (i), (j), & (k); 230.5(a), (c), & (d): This facility has four (4) gasoline dispensing sites (emission units U-11005, -1490G, U-2140G, & U-4230G) that are required to operate with stage I vapor collection and control systems. The facility has elected to install and operate stage II vapor collection and control systems at these 4 sites as well. These citations require the facility to operate, maintain, test, keep records, and submit reports to demonstrate the stage I & II vapor collection and control systems meet the requirements of 6 NYCRR Part 230.

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