

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019

Facility Identification Data

Name: ANCHOR GLASS CONTAINER CORP
Address: 151 E MCCANNS BLVD
ELMIRA HEIGHTS, NY 14903

Owner/Firm

Name: ANCHOR GLASS CONTAINER CORPORATION
Address: 151 E MCCANNS BLVD
ELMIRA HEIGHTS, NY 14903, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: KIMBERLY A MERCHANT
Address: 6274 E AVON LIMA RD
AVON, NY 14414-9519
Phone:5852262466

Division of Air Resources:
Name: MICHAEL S WHEELER
Address: NYSDEC - REGION 8
6274 E AVON LIMA RD
AVON, NY 14414
Phone:5852262466

Air Permitting Contact:
Name: HELEN P REVELAS
Address: ANCHOR GLASS CONTAINER CORP
151 E MCCANNS BLVD
ELMIRA HEIGHTS, NY 14903
Phone:6077371933

**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

Application for renewal of Air Title V Facility with inclusion of conversion of the #1 Furnace to an oxy-fuel fired unit which will increase furnace throughput from 400 to 425 Tons/day. Application also reflects the provisions of a final consent decree between Anchor Glass and the USEPA. Furnace #1 modification and increase in size will be accompanied by add on controls reducing NOx, SO2 and particulate emissions.

**Division of Air Resources
Permit Review Report**

**Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019**

The New Source Review calculations show net decreases in those contaminants after including all sources at the facility affected by the furnace increase. Particulate emissions from fugitive emissions were also included in the NSR calculation as Anchor's glass furnace is subject to an NSPS regulating particulate emissions.

Attainment Status

ANCHOR GLASS CONTAINER CORP is located in the town of ELMIRA in the county of CHEMUNG. 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:

This facility manufactures glass containers for the beverage and food packaging industries. Raw materials (e.g., sand, limestone, soda ash, and minor quantities of other solid mineral products) are delivered to the facility by rail car and by truck. Upon receipt, raw materials are unloaded in bulk into screw conveyors that transfer the different raw materials to separate storage silos. Raw materials are weighed in precise amounts and blended for delivery to the glass melting furnace. The precisely mixed raw materials are delivered to the furnaces for continuous melting. The furnaces, which are fueled by natural gas melt the raw materials into a viscous fluid. The glass is cooled to forming temperatures in the refiner, alcoves, and forehearths. Shearing mechanisms cut continuous streams of molten glass into precise increments of hot, viscous glass called gobs. Those gobs are gravity fed to the forming machines. The forming machines form containers from the gob s by shaping the glass using a combination of mechanical pressing and air blowing processes. Several hundred containers per minute are produced. The glass containers then pass through a hot end vapor deposition hood, where a tin based coating is applied as a surface preparation prior to the cold end coating. Containers are delivered on a belt to annealing lehrs to remove residual stresses induced during container forming and then to allow the containers time to cool before further processing. After the annealing process, containers pass through a fog coating hood which applies a food grade material for surface lubricity to aid in subsequent handling. A spray coater applies a polyethylene coating after application of the food-grade coating to the container's exterior surface as a scratch preventative. A videojet printing system puts identifying numbers on selected containers and cartons as required by various customers. Containers are then automatically put into cardboard boxes or onto pallets for bulk handling and shipping. 11 material silos vented through proper control are exempt sources and not permitted.

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

furnace #1 will use add on control equipment to reduce emissions, furnace #2 will continue to operate without any control equipment.

Emissions of NO_x will be controlled by Selective Catalytic Reduction (SCR) by injecting ammonia into the exhaust stream after particulate control but before release to atmosphere. Ammonia will be stored in a 10,000 gallon horizontal tank.

Emissions of SO₂ will be controlled by injecting lime into the exhaust stream (dry scrubber), before particulate control, and collecting the resulting particulate matter on the ceramic filters. Lime will be stored in a 2,000 cubic foot silo.

Particulate matter is to be collected by a ceramic filtration system.

Permit Structure and Description of Operations

The Title V permit for ANCHOR GLASS CONTAINER CORP

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.

ANCHOR GLASS CONTAINER CORP is defined by the following emission unit(s):

Emission unit 000003 - Boolean date and code printing.

Process: OO3 is located at Building 1M - This process is the printing of the final product (glass containers) with boolean dates and codes, specific to the customer, through the use of videojet printers.

Emission unit 000005 - Cullet crushing.

Process: OO5 is located at Building OUTSIDE - This process is the crushing of various colors and types of cullet.

**Division of Air Resources
Permit Review Report**

**Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019**

Emission unit 000001 - Two natural gas glass melting furnaces, six associated hot end coating operations and six associated glass forming lines.

Emission unit 000001 is associated with the following emission points (EP):
00001, 00002, R1VNT, R2VNT
Process: O1A is located at Building 1M -

Process: O1B is located at Building 1M - Glass forming. This process shears continuous streams of molten glass into precise increments of hot, viscous glass called gobs. These gobs are gravity-fed to forming machines which form containers by shaping the glass using mechanical pressing and air blowing.

Process: O1C is located at Building 1M - Hot End Coating. In this process glass containers pass through a hot end vapor deposition hood, wherein a tin-based coating is applied as a surface preparation prior to the cold end coating, and annealing lehrs.

Emission unit 000006 - This emission unit consists of a natural gas fired boiler (Boiler #6) with a maximum rated capacity of 15.1 MMBtu/Hr, originally installed in 1945, but taken out of service around 1997 and returned to service on 10/04/2012 with burner installed from deactivated Boiler#5.

Emission unit 000006 is associated with the following emission points (EP):
B0001

Process: 006 is located at Building 1M - This process consists of a 15.1 MMBtu/Hr boiler (boiler #6) fueled by natural gas. The unit was returned to service on 10/04/2012 from 15 year period of inactivity.

Emission unit 000007 - Sorbent handling and filter dust handling

Emission unit 000007 is associated with the following emission points (EP):
00019, SH001, SH002

Process: 07A is located at Building OUTSIDE - Sorbent injection, conveying, silo

Process: 07B is located at Building OUTSIDE - Dust handling: sorbent collection, conveying, transport; pneumatic conveying; bulk bag collection stations

Emission unit 000002 - Raw material handling and cullet storage.

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019

00004, 00024, 00025, 00026, 00027, 00028, ESRN9

Process: O2B is located at Building BHS - This process represents cullet storage and raw material handling (ie: transferring, weighing, mixing, conveying, etc...)

Process: OO2 is located at Building BHS - Raw material processes. Unloading, weighing, transferring, mixing, etc., of raw materials used in the glass making process. These raw materials include, but are not limited to, soda ash, sand, limestone, and cullet.

Title V/Major Source Status

ANCHOR GLASS CONTAINER CORP is subject to Title V requirements. This determination is based on the following information:

The Anchor Glass Container Facility is a Major Facility due to it's emissions of NO_x, Particulates and SO₂. The facility calculated NO_x potential emissions are 422 tons per year, SO₂ potential emissions are 208 tons per year and Particulate potential emissions are 126 tons per year. Emissions of NO_x, SO₂ and Particulates are all above the major source threshold of 100 tons per year.

Program Applicability

The following chart summarizes the applicability of ANCHOR GLASS CONTAINER CORP with regards to the principal air pollution regulatory programs:

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

Division of Air Resources
Permit Review Report

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

NSR New Source Review (6 NYCRR 231-5, 231-6) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - 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 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 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, 6 NYCRR 200.10) - 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

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019

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
3221	GLASS CONTAINERS
9999	NONCLASSIFIABLE ESTABLISHMENTS

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
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-05-014-02	MINERAL PRODUCTS MINERAL PRODUCTS - GLASS MANUFACTURE Container Glass: Melting Furnace
3-05-014-06	MINERAL PRODUCTS MINERAL PRODUCTS - GLASS MANUFACTURE Container Glass: Forming/Finishing
3-05-014-10	MINERAL PRODUCTS MINERAL PRODUCTS - GLASS MANUFACTURE Raw Material Handling (All Types of Glass)
3-05-014-13	MINERAL PRODUCTS MINERAL PRODUCTS - GLASS MANUFACTURE Cullet: Crushing/Grinding
4-02-999-95	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS Specify in Comments Field

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount 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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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

**Division of Air Resources
Permit Review Report**

**Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019**

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	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
007664-41-7	AMMONIA	2000		2000	
007440-43-9	CADMIUM	45		34	
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS	131606539		212770677	
000630-08-0	CARBON MONOXIDE	98557		69599	
007440-47-3	CHROMIUM	85		65	
007440-48-4	COBALT	72		55	
007647-01-0	HYDROGEN CHLORIDE	7795		10211	
007439-92-1	LEAD	142		107	
007439-96-5	MANGANESE	36		28	
000078-93-3	METHYL ETHYL KETONE	1722		1315	
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	59		45	
0NY210-00-0	OXIDES OF NITROGEN	876705		944422	
0NY075-00-0	PARTICULATES	298416		240338	
0NY075-02-5	PM 2.5	298416		240338	
0NY075-00-5	PM-10	298416		240338	
007446-09-5	SULFUR DIOXIDE	415389		444918	
0NY100-00-0	TOTAL HAP	24980		19071	
0NY998-00-0	VOC	70792		57801	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(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 C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(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

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

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

- Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(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 E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(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 F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(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 G: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item H: Severability - 6 NYCRR Part 201-6.4(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 I: Permit Shield - 6 NYCRR Part 201-6.4(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;

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

- 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 J: Reopening for Cause - 6 NYCRR Part 201-6.4(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 K: 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.

**Division of Air Resources
Permit Review Report**

**Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019**

Item L: 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: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;
- (3) During the period of the emergency the facility owner 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 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 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_02

Item B: 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

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

permit.

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
-- FACILITY	ECL 19-0301	55	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A	31	General provisions
0-00001/-/01A/10000	40CFR 60-CC.292	42	Glass melting furnaces - standards for particulate matter
0-00001/-/01A/20000	40CFR 60-CC.293	47	Glass melting furnaces - standards for particulate matter from glass melting furnace with modified-processes
FACILITY	40CFR 64	32	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	40CFR 98	33	Mandatory Greenhouse Gas Reporting
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	56	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 34, 35	Title V Permits and the Associated Permit Conditions
0-00001/-/01A/10000	6NYCRR 201-6.4	37	Standard Permit Requirements

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

0-00001/-/O1A/20000	6NYCRR 201-6.4	43	Standard Permit Requirements
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)	23	Operational Flexibility
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.4(g)	24	Permit Shield
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	57	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	25	General Prohibitions - visible emissions limited.
0-00001/-/O1A/20000	6NYCRR 212-1.5(d)	44, 45	BACT or T-BACT for process emission sources
0-00001	6NYCRR 212-1.5(e)(1)	36	Demonstrating compliance with Part 212 through the federal NSPS
FACILITY	6NYCRR 212-1.6(a)	26	Limiting of Opacity
FACILITY	6NYCRR 212-2.1(b)	27	Conditions should be cited under Table 3 or Table 4, 212-2.3 (a) or (b)
0-00001/-/O1A/10000	6NYCRR 212-2.1(b)	38, 39	Conditions should be cited under Table 3 or Table 4, 212-2.3 (a) or (b)
FACILITY	6NYCRR 212-2.4(b)	28	Control of Particulate from New and Modified Process Emission Sources
0-00001/-/O1A/10000	6NYCRR 212-2.4(b)	40	Control of Particulate from New and Modified Process Emission Sources
0-00002/-/O02/24A00	6NYCRR 212-2.4(b)	48	Control of

**Division of Air Resources
Permit Review Report**

**Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019**

0-00002/-/002/25A00	6NYCRR 212-2.4(b)	49	Particulate from New and Modified Process Emission Sources
0-00002/-/002/27A00	6NYCRR 212-2.4(b)	50	Control of Particulate from New and Modified Process Emission Sources
0-00002/-/002/4A000	6NYCRR 212-2.4(b)	51	Control of Particulate from New and Modified Process Emission Sources
0-00002/-/002/9A000	6NYCRR 212-2.4(b)	52	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
0-00001/-/01A/10000	6NYCRR 220-2.4(b)	41	Furnace NOx monitoring.
0-00001/-/01A/20000	6NYCRR 220-2.4(b)	46	Furnace NOx monitoring.
FACILITY	6NYCRR 226	29	SOLVENT METAL CLEANING PROCESSES
0-00006/-/006/BOIL1	6NYCRR 227-1.3(a)	53	Smoke Emission Limitations.
0-00006/-/006/BOIL1	6NYCRR 227-2.4(d)	54	Small boilers, small combustion turbines, and small stationary internal combustion engines.
FACILITY	6NYCRR 231-11.2(b)	30	Reasonable Possibility requirements for insignificant mods - less than 50% with excluded emissions
FACILITY	6NYCRR 257-8.3(b)	58	Ambient Air Quality Standards - Fluorides

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

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

6 NYCRR 201-6.4 (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

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

monitoring, as necessary.

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)

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

6 NYCRR 201-6.4 (e)

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

6 NYCRR 201-6.4 (f) (6)

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

6 NYCRR 201-6.4 (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.

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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

40 CFR Part 68

This Part lists the regulated substances and 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.

Facility Specific Requirements

In addition to Title V, ANCHOR GLASS CONTAINER CORP has been determined to be subject to the following regulations:

40 CFR 60.292

This condition sets the particulate emissions standard for glass melting furnaces which fire gaseous fuels, liquid fuels, or a combination of both.

40 CFR 60.293

This condition requires the owner or operator of a glass melting furnace with a modified process to install, calibrate, maintain, and operate a continuous opacity monitor

40 CFR Part 60, Subpart A

This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

40 CFR Part 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

40 CFR Part 98

40 CFR Part 98 sets forth the reporting requirements for facilities that are subject to the mandatory reporting of greenhouse gases.

6 NYCRR 201-6.4

This section identifies all standard requirements for Title V permits, and, in Anchor's situation, identifies particulate emission limits negotiated in the USA v. Anchor consent Decree.

6 NYCRR 201-6.4 (f)

This section describes the operational flexibility protocol proposed by the facility. The protocol will allow the facility owner or operator to make certain changes at the facility without the need for a permit modification. Changes made pursuant to the protocol must be approved by the Department, and will be rolled into the permit during the next renewal or modification.

6 NYCRR 211.1

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

6 NYCRR 212-1.5 (d)

This provision allows for the department to specify a less restrictive permissible emission rate or degree of air cleaning for the process emission source or emission point than required under Subpart 212-2 in instances where a facility owner or operator can demonstrate to the satisfaction of the department that the facility owner will apply the Best Available Control Technology (BACT) for that criteria air contaminant or the Best Available Control Technology for a toxic air contaminant (T- BACT).

**Division of Air Resources
Permit Review Report**

**Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019**

6 NYCRR 212-1.5 (e) (1)

A process emission source subject to a Federal New Source performance Standard satisfies the requirements of Part 212 for the respective air contaminant regulated by the Federal standard.

6 NYCRR 212-1.6 (a)

This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.1 (b)

This provision applies to any air contaminant not listed on the High Toxicity Air Contaminant List (HTAC) and states the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 - or Table 4.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 220-2.4 (b)

Compliance with the NO_x RACT emission limit(s) established in subdivision 220-2.3(a) shall be demonstrated by measuring NO_x emissions with a CEMS. The CEMS shall comply with the requirements of subdivision 220-2.4(c) or with equivalent requirements approved by the department.

6 NYCRR 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.

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019

6 NYCRR 227-2.4 (d)

This section includes NOx RACT requirements for small boilers, small combustion turbines, and small stationary internal combustion engines.

6 NYCRR 231-11.2 (b)

This subdivision is referred to as the "Reasonable Possibility" provisions. This citation lists the record keeping requirements for insignificant modifications that are less than 50% of the applicable significant project threshold including excluded emissions as defined in Part 231-4.1(b)(40)(i)(c).

6 NYCRR 257-8.3 (b)

This regulation contains the ambient air quality standards for gaseous emissions of fluorides.

6 NYCRR Part 226

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

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR Part 63, Subpart SSSSSS	Glass Manufacturing Area Source NESHAP
Reason: Anchor does not process any urban HAP metals (As, Cd, Cr, Pb, Mn, Ni) as raw materials (not including trace materials in non-HAP raw materials such as sand) in the glass furnaces. Processing any urban HAP metals could subject Anchor to 40 CFR 63.SSSSSS.		
0-00001/-/01A	6 NYCRR 212-1.1 (a) (1)	General Provisions - Applicability
Reason: Emissions of NOx from the glass melting furnaces, Unit 1-00000 Process 01A, are regulated via 6NYCRR Part 220-2 and are not subject to Part 212. Emissions of all particulate matter from the glass melting furnaces, Unit 1-00000 Process 01A, including particulate metal HAPs,		

**Division of Air Resources
Permit Review Report**

Permit ID: 8-0704-00036/00041
Renewal Number: 3
10/15/2019

are regulated via 40CFR60.CC. Compliance with 40CFR60.CC satisfies compliance with 6NYCRR Part 212.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification
Summary of monitoring activities at ANCHOR GLASS CONTAINER CORP:

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

0-00001/-/01A/10000	42	intermittent emission testing
0-00001/-/01A/20000	47	continuous emission monitoring (cem)
FACILITY	32	record keeping/maintenance procedures
0-00001/-/01A/10000	37	intermittent emission testing
0-00001/-/01A/20000	43	continuous emission monitoring (cem)
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
0-00001/-/01A/20000	44	continuous emission monitoring (cem)
0-00001/-/01A/20000	45	continuous emission monitoring (cem)
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	record keeping/maintenance procedures
0-00001/-/01A/10000	38	intermittent emission testing
0-00001/-/01A/10000	39	continuous emission monitoring (cem)
FACILITY	28	monitoring of process or control device parameters as surrogate
0-00001/-/01A/10000	40	monitoring of process or control device parameters as surrogate
0-00002/-/002/24A00	48	monitoring of process or control device parameters as surrogate
0-00002/-/002/25A00	49	monitoring of process or control device parameters as surrogate
0-00002/-/002/27A00	50	monitoring of process or control device parameters as surrogate
0-00002/-/002/4A000	51	monitoring of process or control device parameters as surrogate
0-00002/-/002/9A000	52	monitoring of process or control device parameters as surrogate
0-00001/-/01A/10000	41	continuous emission monitoring (cem)
0-00001/-/01A/20000	46	continuous emission monitoring (cem)
FACILITY	29	record keeping/maintenance procedures
0-00006/-/006/BOIL1	53	monitoring of process or control device parameters as surrogate
0-00006/-/006/BOIL1	54	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures

Division of Air Resources
Permit Review Report

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

Basis for Monitoring

40 CFR 60.292 - Particulate Emissions from furnace #1, a 'new' glass furnaces are regulated 40 CFR 60.292. This NSPS limits emissions to 0.2 pounds of filterable Particulate Matter per ton of glass produced. This limit is more restrictive than the particulate emissions limits contained in 6 NYCRR 212-2.4 (b). Therefore, conditions limiting particulate matter under 6 NYCRR 212-2.4 (b) will not be included in the permit.

An initial performance test is required within 6 months of startup for furnace #1.

40 CFR 60.293 - Particulate Emissions from furnace #2, a 'modified' glass furnaces are regulated 40 CFR 60.293. This NSPS limit PM to 1.0 # of filterable particulate per ton of glass produced. These limits are more restrictive than the particulate emissions limits contained in 6 NYCRR 212-2.4 (b).

6 NYCRR 201-6.4. The consent decree also limits total suspended particulate from each furnace. This applicable requirement will be cited under 201-6.4 for each furnace.

An initial performance test is required within 6 months of startup for furnace #1.

6 NYCRR 212-1.6 (a) - Monitoring of opacity from the process sources. This does not include the glass furnaces or the boiler as both are applicable to other rules. The facility is responsible to ensure that the emissions from any of their stacks do not exceed 20% opacity. Visual observations of the emissions will be conducted daily during typical operations for the associated process during periods of operation. Any time excess emissions occur, the facility will be required to correct the problem or to perform a Method 9 assessment to determine if the opacity requirement is met.

6 NYCRR 212-2.4 (b) - Particulate emissions limit for process sources. This does not include the glass furnaces or the boiler as both are applicable to other rules. The facility will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate of 0.050 grains of particulate per cubic foot. Most concerning are the particulate handling baghouses. Anchor will also monitor the pressure drop in the baghouses (24A00, 25A00, 27A00, 4A000 and 9A000) to ensure they are working properly.

6 NYCRR 212-2.1(b) - Non-HTAC air pollutant degree of cleaning. The facility is required to ensure that emissions of air pollutants meet a certain degree of air cleaning based on the air pollutant and its environmental rating. Engineering emission estimates, mass balances, process flows, production records, control equipment parameters, etc. will be monitored to ensure compliance with the degree of air cleaning required. The facility is responsible for continuous compliance with the degree of air cleaning required for non-criteria air pollutants. Records shall be kept on site and reports are submitted to the department annually.

6 NYCRR 212-2.1(b) - Emissions of SO₂ from furnace #1 are required to be reduced 75% to comply with Table 3. CEMs will be used to show emissions of SO₂ do not exceed 0.7 pounds of SO₂ per ton of glass produced.

6 NYCRR 212-1.5(d) - Emissions of SO₂ from furnace #2 are subject to BACT in lieu of the percent reduction required by Part 212-2 Table 3. In conjunction with the CD and previous department authorizations, the limits of 1.8 pounds of SO₂ per ton of flint glass produced and 2.1 pounds of SO₂ per

Division of Air Resources
Permit Review Report

Permit ID: 8-0704-00036/00041

Renewal Number: 3

10/15/2019

ton of colored glass produced are determined to be BACT on an interim basis until the next cold tank repair. CEMs will be used to show compliance with the emissions limits.

6 NYCRR 212-1.5(e)(1) – Anchor glass is subject to 40 CFR 60 Subpart CC (NSPS CC) for Glass Manufacturing Plants. NSPS CC regulates particulate matter, therefore under 6 NYCRR 212-1.5(e)(1) Anchor is exempt from the part 212 requirements for particulate matter coming from their glass melting furnaces. Anchor's glass melting furnaces emit particulate metal High Toxicity Air Contaminants (HTACs). These metal HTACs are constituents of particulate matter and therefore exempt from the 6 NYCRR Part 212 regulation.

6 NYCRR Part 220 – NYS Glass Plant regulation (NO_x RACT) and CD limit of 1.2 pounds of NO_x per ton of glass produced. This requires Anchor to continuously monitor the NO_x emissions from their glass melting furnaces to demonstrate compliance with the NO_x emissions limit.

6 NYCRR Part 220 – NYS Glass Plant regulation (NO_x RACT) and CD limit of 4.5 pounds of NO_x per ton of glass produced. This interim NO_x RACT limit requires Anchor to continuously monitor the NO_x emissions from their glass melting furnaces to demonstrate compliance with the NO_x emissions limit.

6 NYCRR Part 225 – Sulfur in Fuel Regulation. This regulation limits the sulfur content in fuel oil that Anchor uses for their boiler to 0.0015 percent by weight. Anchor must maintain supplier shipment records on site to verify compliance with this limit.

6 NYCRR Part 227 – Monitoring of opacity from the Boiler. The facility is responsible to ensure that the emissions from their boiler do not exceed 20% opacity. Visual observations of the emissions will be conducted monthly during typical operations for the associated emission source, process, etc during periods of operation. Any time excess emissions occur for an extended period of time, the facility will be required to perform a Method 9 assessment to determine if the opacity requirement is met. If opacity is not met the facility must perform corrective actions.

6 NYCRR Part 231-11.2(b) 1 Permit and Reasonable Possibility requirements For Insignificant Modification. The New Source Review (NSR) control requirements do not apply to the furnace modification as the project qualifies as an insignificant modification. Part 231-11.2(b) contains requirements to maintain records of non-applicability to NSR for a minimum of 5 years.

40 CFR 63, Subpart SSSSSS – NESHAP for Glass Manufacturing Area Source Regulation. This condition requires recordkeeping and reporting of HAP emissions (Hazardous Air Pollutants). Anchor Glass Container Corp. is prohibited from processing any urban HAP metals (As, Cd, Cr, Pb, Mn, Ni) as raw materials (not including trace materials in non-HAP raw materials such as sand) in the glass furnaces.

40 CFR 64 - Compliance Assurance Monitoring (CAM). CAM is required for any unit which has pre-controlled potential emissions of any contaminant above the major source thresholds and utilizes control equipment to meet an applicable emission limit. NO_x, SO₂ and Particulate Matter are applicable to the CAM rule for furnace #1. A part 64 condition on the permit discusses the applicability. The extensive monitoring, testing, record keeping and reporting requirements contained in the permit satisfy the CAM requirements.

Furnace #2 does not utilize add on pollution control equipment at this time and is not subject to Part 64.