



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

Permit ID: 8-4424-00001/00023

Renewal Number: 1

Modification Number: 1 02/28/2011

Facility Identification Data

Name: CARGILL SALT CO- WATKINS GLEN PLANT

Address: 518 E 4TH ST

WATKINS GLEN, NY 14891

Owner/Firm

Name: CARGILL INC

Address: 15407 MCGINTY ROAD WEST

WAYZATA, MN 55391-2399, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: ROGER T MCDONOUGH

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AVON, NY 14414-9519

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Division of Air Resources:

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Air Permitting Contact:

Name: ERIC HALLMAN, SR

Address: CARGILL SALT

518 E 4TH ST

WATKINS GLEN, NY 14891

Phone:6075356373

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

Installation and operation of new process equipment associated with a new process line (CENTER MILL). The new line(EU 19) will also serve as back-up for existing flake salt processing line (EU 14). This also includes updates for previous EP 13 op flex approvals. This is a minor mod.

Attainment Status



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CARGILL SALT CO- WATKINS GLEN PLANT is located in the town of DIX in the county of SCHUYLER.

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:

Food grade and other salt products are manufactured and packaged from processing brine solutions.

Permit Structure and Description of Operations

The Title V permit for CARGILL SALT CO- WATKINS GLEN PLANT is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
 combustion - devices which burn fuel to generate heat, steam or power
 incinerator - devices which burn waste material for disposal
 control - emission control devices
 process - any device or contrivance which may emit air contaminants that is not included in the above categories.

CARGILL SALT CO- WATKINS GLEN PLANT is defined by the following emission unit(s):

Emission unit U00014 - Flake salt conveying, screening, storage and miscellaneous processing operations are vented through a fabric filter.



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Emission unit U00014 is associated with the following emission points (EP):
00014

Process: 014 is located at MILL BUILDING (SOUTH, Building SOUTH MILL - Flake salt conveying screening, storage miscellaneous processing operations installed prior to 8/1/83.

Process: N14 is located at Mill Building (South, Building SOUTH MILL - Flake salt conveying, screening, storage and miscellaneous processing operations installed after 8/1/83 (NSPS Subpart OOO applicable).

Emission unit U00019 - CENTER MILL product line. Flake mill, conveying, screening, blending, storage and miscellaneous processing operations.

Emission unit U00019 is associated with the following emission points (EP):
00019

Process: B19 is located at Mill Bldg (South), Building SOUTH MILL - Back-up for flake salt operations (EU U-00014). Flake mill, conveying, screening, storage and miscellaneous processing operations installed after 4/22/08 (NSPS Subpart OOO applicable).

Process: N19 is located at Building SOUTH MILL - CENTER MILL product line. Flake mill, blending, conveying, screening, storage and miscellaneous processing operations installed after 4/22/08 (NSPS Subpart OOO applicable).

Emission unit U00013 - Flake salt and CENTER MILL conveying and packaging operations exhausted through EP 00013.

Emission unit U00013 is associated with the following emission points (EP):
00013

Process: 013 is located at MILL BUILDING (SOUTH, Building SOUTH MILL - Flake salt and CENTER MILL product conveying and packaging operations installed prior to 8/1/83.

Process: N13 is located at Mill Building (South, Building SOUTH MILL - Flake salt and CENTER MILL product conveying and packaging operations installed after 8/1/83 and before 4/22/08 (NSPS Subpart OOO applicable).

Emission unit U00001 - TWO 92.2 MMBTU/HR ERIE COAL-FIRED SPREADER STOKER TYPE BOILERS ARE USED TO GENERATE PROCESS STEAM. THE EMISSIONS RESULTING FROM THE TWO BOILERS ARE VENTED SEPARATELY THROUGH A SELF-CONTAINED MULTICLONE SYSTEM AND ARE VENTED TOGETHER THROUGH A BAGHOUSE PRIOR TO ENTERING THE ATMOSPHERE.

Emission unit U00001 is associated with the following emission points (EP):
00001

Process: 001 is located at BOILER ROOM, Building BR - TWO 92.2 MMBTU/HR ERIE COAL-FIRED SPREADER STOKER TYPE BOILERS USED TO GENERATE PROCESS STEAM. THE EMISSIONS



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RESULTING FROM THE OPERATION OF THE TWO BOILERS ARE VENTED SEPARATELY TO THEIR SELF-CONTAINED MULTI-CLONE SYSTEM AND ARE VENTED TOGETHER THROUGH A FABRIC FILTER PRIOR TO ENTERING THE ATMOSPHERE.

Emission unit U00007 - ROTARY SALT COOLER USED TO COOL SALT PRIOR TO PROCESSING OPERATIONS. AIR EMISSIONS FROM ROTARY SALT COOLER AND FLAKE ROOM CLEANUP OPERATIONS ARE VENTED TO A WET SCRUBBER PRIOR TO BEING RELEASED TO THE ATMOSPHERE.

Emission unit U00007 is associated with the following emission points (EP):
00007

Process: 007 is located at MILL BUILDING (SOUTH, Building SOUTH MILL - ROTARY SALT COOLER USED TO COOL SALT PRIOR TO PROCESSING OPERATIONS. AIR EMISSIONS FROM THE ROTARY SALT COOLER AND FLAKE ROOM CLEANUP OPERATIONS ARE VENTED TO A WET SCRUBBER PRIOR TO BEING RELEASED TO THE ATMOSPHERE.

Process: 07A is located at Mill Building (South, Building SOUTH MILL - Flake clean-up operations.

Emission unit U00008 - FLUID-BED SALT DRYER USED TO DRY SALT SLURRY PRIOR TO PROCESSING OPERATIONS. AIR EMISSIONS FROM FLUID-BED SALT DRYER ARE VENTED TO A WET SCRUBBER PRIOR TO BEING RELEASED TO THE ATMOSPHERE.

Emission unit U00008 is associated with the following emission points (EP):
00008

Process: 008 is located at PAN BUILDING, Building PAN - FLUID-BED SALT DRYER USED TO DRY SALT SLURRY PRIOR TO PROCESSING OPERATIONS. AIR EMISSIONS FROM THE FLUID-BED SALT DRYER ARE VENTED TO A WET SCRUBBER PRIOR TO BEING RELEASED TO THE ATMOSPHERE.

Emission unit U00009 - AIR EMISSIONS FROM MISCELLANEOUS CONVEYORS, SURGE BINS, AND BAGGING OPERATIONS IN THE MILL BUILDING ARE VENTED TO A FABRIC FILTER PRIOR TO BEING RELEASED TO THE ATMOSPHERE. THESE EMISSIONS ARE VENTED TO THE DUAL-MODULE SIDE OF THE FILTER. THE FABRIC FILTER IS A THREE-MODULE UNIT.

Emission unit U00009 is associated with the following emission points (EP):
00009

Process: 009 is located at MILL BUILDING, Building MILL - AIR EMISSIONS FROM MISCELLANEOUS CONVEYORS, SURGE BINS, AND BAGGING OPERATIONS IN THE MILL BUILDING ARE VENTED TO A FABRIC FILTER PRIOR TO BEING RELEASED TO THE ATMOSPHERE. THESE EMISSIONS ARE VENTED TO THE DUAL-MODULE SIDE OF THE FABRIC FILTER. THE FABRIC FILTER IS A THREE-MODULE UNIT.

Process: 09N is located at Mill Building, Building MILL - Miscellaneous conveyors, surge bins, screens, bagging and other processing operations installed after 8/1/83 (NSPS Subpart OOO applicable).

Emission unit U00015 - BLOCK PRESS AND PACKAGING OPERATIONS ARE VENTED TO A FABRIC FILTER PRIOR TO BEING VENTED TO THE ATMOSPHERE.

Emission unit U00015 is associated with the following emission points (EP):
00015

Process: 015 is located at MILL BUILDING (NORTH, Building NORTH MILL - BLOCK PRESS AND PACKAGING OPERATIONS ARE VENTED TO A FABRIC FILTER PRIOR TO BEING VENTED TO THE ATMOSPHERE.



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Process: N15 is located at Mill Building (North, Building NORTH MILL - Bulk material conveying, screening, storage and transfer operations installed after 8/1/83 (NSPS Subpart OOO applicable)

Emission unit U00016 - PELLET PROCESSING AND PACKAGING OPERATIONS ARE VENTED TO A WET SCRUBBER PRIOR TO BEING RELEASED TO THE ATMOSPHERE.

Emission unit U00016 is associated with the following emission points (EP):
00016

Process: 016 is located at PELLET BUILDING, Building PELLET - PELLET PROCESSING AND PACKAGING OPERATIONS ARE VENTED TO A WET SCRUBBER PRIOR TO BEING RELEASED TO THE ATMOSPHERE.

Process: N16 is located at Pellet Building, Building PELLET - Pellet processeing, conveying, screening, storage and packaging operations installed after 8/1/83 (NSPS Subpart OOO applicable)

Emission unit UBLR02 - ONE 33.5 MMBTU/HR DUAL-FIRED (NATURAL GAS AND NO. 2 FURL OIL) BOILER WITH LOW NO_x BURNER. THE NO. 2 FUEL OIL IS USED PRIMARILY AS AN EMERGENCY BACK-UP FUEL SOURCE.

Emission unit UBLR02 is associated with the following emission points (EP):
00017, 00018

Process: F02 is located at BOILER ROOM, Building BR - NO. 2 FUEL OIL COMBUSTION IN THE 33.5 MMBTU/HR DUAL-FIRED (NATURAL GAS AND NO. 2 FUEL OIL) BOILER. THE BOILER IS EQUIPPED WITH A LOW NOX BURNER.

Process: FO3 is located at Boiler Room, Building BR - This process configuration consists of No. 2 fuel oil combustion in the 10.5 MMBTU/hr dual fired (natural gas and No. 2 fuel oil) boiler.

Process: NG2 is located at BOILER ROOM, Building BR - NATURAL GAS COMBUSTION IN THE 33.5 MMBTU/HR DUAL-FIRED (NATURAL GAS AND NO. 2 FUEL OIL) BOILER. THE BOILER IS EQUIPPED WITH A LOW NOX BURNER.

Process: NG3 is located at Boiler Room, Building BR - This process configuration consists of natural gas combustion in the 10.5 MMBTU/hr dual fired (natural gas and No. 2 fuel oil) boiler.

Title V/Major Source Status

CARGILL SALT CO- WATKINS GLEN PLANT is subject to Title V requirements. This determination is based on the following information:

This facility is subject to Title V permitting because the facility has actual emissions of oxides of nitrogen and sulfur dioxide that are greater than major source thresholds (i.e., > 100 tons per year)

Program Applicability

The following chart summarizes the applicability of CARGILL SALT CO- WATKINS GLEN PLANT 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	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

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

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

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

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

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

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

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

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of



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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

2899

CHEMICAL PREPARATIONS, NEC

SCC Codes

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

SCC Code

Description

1-02-002-04

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - SUBBITUMINOUS COAL
Spreader Stoker

1-02-006-02

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - NATURAL GAS
10-100 MMBtu/Hr

1-03-005-01

EXTERNAL COMBUSTION BOILERS -
COMMERCIAL/INDUSTRIAL
COMMERCIAL/INSTITUTIONAL BOILER -
DISTILLATE OIL

1-03-005-02

EXTERNAL COMBUSTION BOILERS -
COMMERCIAL/INDUSTRIAL
COMMERCIAL/INSTITUTIONAL BOILER -
DISTILLATE OIL

1-03-006-02

10-100MMBTU/HR **
EXTERNAL COMBUSTION BOILERS -
COMMERCIAL/INDUSTRIAL
COMMERCIAL/INSTITUTIONAL BOILER - NATURAL
GAS

3-05-021-01

10-100 MMBtu/Hr
MINERAL PRODUCTS

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3-05-021-04	MINERAL PRODUCTS - SALT MINING General
3-05-021-06	MINERAL PRODUCTS MINERAL PRODUCTS - SALT MINING Crushing MINERAL PRODUCTS MINERAL PRODUCTS - SALT MINING Conveying

Facility Emissions Summary

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

Cas No.	Contaminant Name	PTE	Range
		lbs/yr	
000630-08-0	CARBON MONOXIDE		>= 100 tpy but < 250 tpy
007782-50-5	CHLORINE		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 25 tpy but < 40 tpy
007647-01-0	HYDROGEN CHLORIDE		>= 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
007439-97-6	MERCURY		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy but < 75,000 tpy
0NY075-00-0	PARTICULATES		>= 250 tpy but < 75,000 tpy
0NY075-00-5	PM-10		>= 250 tpy but < 75,000 tpy
007446-09-5	SULFUR DIOXIDE		>= 250 tpy but < 75,000 tpy
007664-93-9	SULFURIC ACID		>= 10 tpy but < 25 tpy
0NY998-00-0	VOC		>= 2.5 tpy but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS



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Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The



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filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

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

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

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

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

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

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be

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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 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.

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

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
-- FACILITY	ECL 19-0301	107	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.11	41	General provisions - compliance with standards and maintenance requirements
FACILITY	40CFR 60-A.12	42	General provisions - Circumvention
FACILITY	40CFR 60-A.14	43	General provisions - Modification
FACILITY	40CFR 60-A.15	44	General provisions - Reconstruction
FACILITY	40CFR 60-A.4	29	General provisions - Address
U-00019/-/B19	40CFR 60-A.4	1 -6	General provisions - Address
U-00019/-/N19	40CFR 60-A.4	1 -5	General provisions - Address
FACILITY	40CFR 60-A.7(a)	30	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(b)	31	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(f)	32	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(g)	33	Notification and Recordkeeping
FACILITY	40CFR 60-A.8(a)	34	Performance Tests
FACILITY	40CFR 60-A.8(b)	35	Performance Tests
FACILITY	40CFR 60-A.8(c)	36	Performance Tests
FACILITY	40CFR 60-A.8(d)	37	Performance Tests
FACILITY	40CFR 60-A.8(e)	38	Performance Tests
FACILITY	40CFR 60-A.8(f)	39	Performance Tests
FACILITY	40CFR 60-A.9	40	General provisions -



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U-BLR02/-/F02/NG002	40CFR 60-Dc.40c	98	Availability of information
U-BLR02/-/NG2/NG002	40CFR 60-Dc.40c	101	Steam generators 10-100 million Btu per hour
U-BLR02/-/F02	40CFR 60-Dc.42c (d)	87	Steam generators 10-100 million Btu per hour
U-BLR02/-/F02	40CFR 60-Dc.42c (g)	88	Standard for Sulfur Dioxide Firing Oil. (see narrative)
U-BLR02/-/F02	40CFR 60-Dc.42c (i)	89	Averaging requirements.
U-BLR02/-/F02	40CFR 60-Dc.43c (c)	90	Standard for Sulfur Dioxide Period of Requirements.
U-BLR02/-/F02	40CFR 60-Dc.44c (h)	91	Standard for Opacity. Alternative Compliance and Performance Test Methods and Procedures for Sulfur Dioxide.
U-BLR02/-/F02	40CFR 60-Dc.46c (e)	92	Exemption from Emission Monitoring for Sulfur Dioxide.
U-BLR02/-/F02	40CFR 60-Dc.48c (d)	93	Reporting and Recordkeeping Requirements.
U-BLR02/-/F02	40CFR 60-Dc.48c (e) (11)	94	Reporting and Recordkeeping requirements - fuel supplier certifications
U-BLR02/-/F02	40CFR 60-Dc.48c (f) (1)	95	Reporting and Recordkeeping Requirements (distillate oil).
U-BLR02/-/F02/NG002	40CFR 60-Dc.48c (g)	99	Reporting and Recordkeeping Requirements.
U-BLR02/-/NG2/NG002	40CFR 60-Dc.48c (g)	102	Reporting and Recordkeeping Requirements.
U-BLR02/-/F02	40CFR 60-Dc.48c (i)	96	Reporting and Recordkeeping Requirements.
U-00009/00009/09N	40CFR 60-000.672	65, 66	Rock, gravel, sand, and clay processing and conveying - standard for particulate matter
U-00013/-/N13	40CFR 60-000.672	70, 71	Rock, gravel, sand, and clay processing and conveying - standard for particulate matter
U-00014/00014/N14	40CFR 60-000.672	75, 76	Rock, gravel, sand, and clay processing and conveying - standard for particulate matter
U-00015/00015/N15	40CFR 60-000.672	80, 81	Rock, gravel, sand, and clay processing



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U-00016/00016/N16	40CFR 60-000.672	85	and conveying - standard for particulate matter Rock, gravel, sand, and clay processing and conveying - standard for particulate matter Rock, gravel, sand, and clay processing and conveying - standard for particulate matter Rock, gravel, sand, and clay processing and conveying - monitoring of operations Rock, gravel, sand, and clay processing and conveying - reporting and recordkeeping
U-00019/00019	40CFR 60-000.672 (a)	1 -8	Rock, gravel, sand, and clay processing and conveying - standard for particulate matter Rock, gravel, sand, and clay processing and conveying - monitoring of operations
U-00019/00019	40CFR 60-000.674 (a)	1 -9	Rock, gravel, sand, and clay processing and conveying - monitoring of operations
FACILITY	40CFR 60-000.676 (a)	45	Rock, gravel, sand, and clay processing and conveying - reporting and recordkeeping
U-00019/00019	40CFR 60-000.676 (c)	1 -10	Rock, gravel, sand, and clay processing and conveying - reporting and recordkeeping
U-00016/00016/N16	40CFR 60-000.676 (d)	86	Rock, gravel, sand, and clay processing and conveying - reporting and recordkeeping
U-00019/00019	40CFR 60-000.676 (d)	1 -11	Rock, gravel, sand, and clay processing and conveying - reporting and recordkeeping
U-00019/00019	40CFR 60-000.676 (e)	1 -12	Rock, gravel, sand, and clay processing and conveying - reporting and recordkeeping
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	1 -13	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



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FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 46, 47	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	1 -1	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	16	Fees
FACILITY	6NYCRR 201-6.5 (c)	3	General conditions
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17	Compliance schedules
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5 (f) (6)	18	Off Permit Changes
FACILITY	6NYCRR 201-6.5 (g)	1 -4	Permit shield
FACILITY	6NYCRR 202-1.1	1 -3	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 211.2	1 -14	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
U-00007	6NYCRR 212.3 (b)	54, 55	General Process Emission Sources - emissions from existing emission sources
U-00007/00007	6NYCRR 212.3 (b)	57	General Process Emission Sources - emissions from existing emission sources
U-00008	6NYCRR 212.4 (a)	58, 59, 60	General Process Emission Sources - emissions from new sources and/or modifications
U-00009/00009	6NYCRR 212.4 (c)	62	General Process Emission Sources - emissions from new processes and/or modifications
U-00009/00009/009	6NYCRR 212.4 (c)	63	General Process Emission Sources - emissions from new processes and/or modifications

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U-00013/-/013	6NYCRR 212.4 (c)	67, 68	General Process Emission Sources - emissions from new processes and/or modifications
U-00014/00014	6NYCRR 212.4 (c)	72	General Process Emission Sources - emissions from new processes and/or modifications
U-00014/00014/014	6NYCRR 212.4 (c)	73	General Process Emission Sources - emissions from new processes and/or modifications
U-00015/00015	6NYCRR 212.4 (c)	77	General Process Emission Sources - emissions from new processes and/or modifications
U-00015/00015/015	6NYCRR 212.4 (c)	78	General Process Emission Sources - emissions from new processes and/or modifications
U-00016/00016	6NYCRR 212.4 (c)	82	General Process Emission Sources - emissions from new processes and/or modifications
U-00016/00016/016	6NYCRR 212.4 (c)	84	General Process Emission Sources - emissions from new processes and/or modifications
U-00007	6NYCRR 212.6 (a)	56	General Process Emission Sources - opacity of emissions limited
U-00008	6NYCRR 212.6 (a)	61	General Process Emission Sources - opacity of emissions limited
U-00009/00009/009	6NYCRR 212.6 (a)	64	General Process Emission Sources - opacity of emissions limited
U-00013/-/013	6NYCRR 212.6 (a)	69	General Process Emission Sources - opacity of emissions limited
U-00014/00014/014	6NYCRR 212.6 (a)	74	General Process Emission Sources - opacity of emissions limited
U-00015/00015/015	6NYCRR 212.6 (a)	79	General Process Emission Sources - opacity of emissions limited
U-00016/00016	6NYCRR 212.6 (a)	83	General Process Emission Sources - opacity of emissions limited
U-00019/00019	6NYCRR 212.6 (a)	1 -7	General Process



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FACILITY	6NYCRR 215.2	1 -2	Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 225-1.2 (a) (2)	24, 25, 110, 111	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.8 (a)	26	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.8 (d)	27	Reports, sampling and analysis.
U-00001/00001	6NYCRR 227-1.2 (a) (4)	50, 51	Reports, sampling, and analysis
U-00001/00001	6NYCRR 227-1.2 (b)	52	Particulate Emissions Firing Solid Fuels.
U-00001	6NYCRR 227-1.3 (a)	48	Particulate Emissions from 2 or More Connected Furnaces.
U-BLR02/00017/F02	6NYCRR 227-1.3 (a)	103	Smoke Emission Limitations.
U-BLR02/00017/F03	6NYCRR 227-1.3 (a)	104	Smoke Emission Limitations.
U-BLR02/00018/F02	6NYCRR 227-1.3 (a)	105	Smoke Emission Limitations.
U-BLR02/00018/F03	6NYCRR 227-1.3 (a)	106	Smoke Emission Limitations.
FACILITY	6NYCRR 227-1.6 (a)	28	Corrective Action.
U-00001/00001	6NYCRR 227-1.7 (a)	53	General Emission Data.
U-00001	6NYCRR 227- 2.4 (c) (1) (ii)	49	Control requirements for mid-sized boilers firing fuels other than gas, distillate oil or residual oil.
U-BLR02/-/F02/NG002	6NYCRR 227-2.4 (d)	97	RACT for Oxides of Nitrogen - small boilers.
U-BLR02/-/NG2/NG002	6NYCRR 227-2.4 (d)	100	RACT for Oxides of Nitrogen - small boilers.

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



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6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.5 (a) (4)

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

6 NYCRR 201-6.5 (a) (7)

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

6 NYCRR 201-6.5 (a) (8)

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



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monitoring, as necessary.

6 NYCRR 201-6.5 (c)

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

6 NYCRR 201-6.5 (c) (2)

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

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

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

6 NYCRR 201-6.5 (d) (5)

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

6 NYCRR 201-6.5 (e)

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

6 NYCRR 201-6.5 (f) (6)

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

6 NYCRR 201-6.5 (g)

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

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.



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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 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 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 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, CARGILL SALT CO- WATKINS GLEN PLANT has been determined to be subject to the following regulations:

40 CFR 60.11

This regulation specifies the type of opacity monitoring requirements in relation to compliance with the standards and maintenance requirements.

40 CFR 60.12

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

40 CFR 60.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.



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40 CFR 60.15

This regulation defines the term reconstruction and what is and is not considered to be a reconstruction project, for the purpose of rule applicability.

40 CFR 60.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40 CFR 60.40c

This regulation requires the source owner or operator to comply with the applicable General Provisions of 40 CFR 60 Subpart Dc. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

40 CFR 60.42c (d)

This regulation requires that on or after the date on which the initial performance test is completed or required to be completed under section 60.8 of 40 CFR 60 Subpart A, no owner or operator of an affected facility that combusts oil, shall combust oil with a sulfur content in excess of 0.5 percent by weight.

40 CFR 60.42c (g)

This regulation requires that compliance with emission limits, percent reduction, and fuel oil sulfur limitations be based on a 30 day rolling average

40 CFR 60.42c (i)

This regulation requires that the sulfur dioxide emission limits, percentage reductions, and fuel oil sulfur limitations apply at all times, including periods of startup, shutdown, and malfunction.

40 CFR 60.43c (c)

This regulation requires that on or after the date on which the initial performance test is completed or is required to be completed, an affected facility that combusts coal, wood, or oil and has a heat input of 30 million Btu per hour (8.7 MW) or greater, shall not cause any gases to be discharged to the atmosphere, that exhibit an opacity greater than 20% (based on a 6-minute average) or exceeds 27% for one 6-minute period per hour.

40 CFR 60.44c (h)

This regulation requires facilities demonstrating compliance through vendor certification to follow the compliance procedures listed in the appropriate paragraphs of 40 CFR 60-Dc.48c.

40 CFR 60.46c (e)

This regulation allows facilities subject to paragraphs 40 CFR 60-Dc.42c(h)(1), (2), or (3) who show compliance through vendor certification, to be exempt from the monitoring requirements of section 40 CFR 60-Dc.46c

40 CFR 60.48c (d)

This regulation requires the owner or operator of the facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c, to submit semi-annual reports to the EPA

40 CFR 60.48c (e) (11)

If fuel supplier certifications are used to demonstrate compliance with the distillate oil specifications



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under 40 CFR 60-Dc.41c, then reports shall include a certified statement signed by the owner or operator that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

40 CFR 60.48c (f) (1)

Fuel supplier certifications for distillate oil shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60-Dc.41c

40 CFR 60.48c (g)

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40 CFR 60.48c (i)

This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

40 CFR 60.672

This rule sets standards for particulate emissions from nonmetallic mineral processing plants. The limits are set in terms of mass concentration and opacity.

40 CFR 60.672 (a)

This regulation limits the opacity of emissions from a stack at a non-metallic processing facility to not greater than 7%. Further, the emissions of particulate matter from the stack may not exceed 0.022 grains per dry standard cubic feet.

40 CFR 60.674 (a)

This regulation sets monitoring parameters for wet scrubbers used to control particulate emissions from non-metallic processing facilities.

40 CFR 60.676 (a)

This rule requires the facility owner to give notification to the Administrator whenever specified process equipment is replaced.

40 CFR 60.676 (c)

This regulation requires documenting wet scrubber monitoring parameters during the performance stack test at non-metallic processing facilities.

40 CFR 60.676 (d)

This regulation requires reporting significant deviations in wet scrubber monitoring parameters at non-metallic processing facilities.

40 CFR 60.676 (e)



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This regulation requires semiannual reporting of wet scrubber operation at non-metallic processing facilities.

40 CFR 60.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40 CFR 60.7 (b)

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

40 CFR 60.7 (f)

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

40 CFR 60.7 (g)

This condition allows source owners to use reporting required for state or local agencies to satisfy the paragraph (a) reporting requirements of this section of this rule.

40 CFR 60.8 (a)

This regulation contains the requirements for the completion date and reporting of Performance Testing (stack testing), at the facility. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner or operator of the facility must conduct performance test(s) and furnish a written report of the test results.

40 CFR 60.8 (b)

This regulation contains the requirements for Performance test methods and procedures, to be used by the owner or operator, of the affected facility.

40 CFR 60.8 (c)

This condition contains the requirements for operating conditions, of the emission source, during performance testing.

40 CFR 60.8 (d)

This regulation contains the requirements for advance notification of Performance (stack) testing.

40 CFR 60.8 (e)

This regulation requires the facility to provide appropriate sampling ports, safe platforms and utilities as necessary for Performance (stack) testing.

40 CFR 60.8 (f)

This regulation requires that Performance (stack) tests consist of three runs unless otherwise specified.



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

40 CFR 60.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

6 NYCRR 212.3 (b)

This rule requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

6 NYCRR 212.4 (a)

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

6 NYCRR 212.4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.6 (a)

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

6 NYCRR 225-1.2 (a) (2)

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

6 NYCRR 225-1.8 (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

6 NYCRR 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.

6 NYCRR 227-1.2 (a) (4)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

6 NYCRR 227-1.2 (b)

This regulation requires the total heating capacity connected to a stack to be used to determine the permissible particulate emission rate.

6 NYCRR 227-1.3 (a)



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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.

6 NYCRR 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

6 NYCRR 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..

6 NYCRR 227-2.4 (c) (1) (iii) ('b')

This regulation allows for alternative NOx RACT limits if justified by the applicant and accepted by the Department.

6 NYCRR 227-2.4 (d)

This rule specifies that the reasonably available control technology (RACT) requirement for small boilers (< or = 50 million BTUs/hr) at Title V facilities consists of an annual tune-up.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	6 NYCRR 231-11.2 (c)	Reasonable Possibility requirements for insignificant mods - greater than 50% with excluded emissions

Reason: Installation and operation of the CENTER MILL product line and associated processes has been determined to be a minor modification in accordance with 6NYCRR Part 231-6.1(a) and 6NYCRR Part 231-8.1(a) New Source Review requirements. Calculations of projected emissions increases submitted with the permit application show increases less than 10 tpy for PM and SO2 and less than 2 tpy for NOx under worst case conditions (full production capacity, 8760 hrs per year). The owner or operator shall comply with the reasonable possibility requirements applicable to this modification in accordance with 6NYCRR Part 231-11.2.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(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

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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 CARGILL SALT CO- WATKINS GLEN PLANT:

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

U-BLR02/-/F02	87	work practice involving specific operations
U-BLR02/-/F02	90	monitoring of process or control device parameters as surrogate
U-BLR02/-/F02	93	record keeping/maintenance procedures
U-BLR02/-/F02	94	record keeping/maintenance procedures
U-BLR02/-/F02	95	record keeping/maintenance procedures
U-BLR02/-/F02/NG002	99	record keeping/maintenance procedures
U-BLR02/-/NG2/NG002	102	record keeping/maintenance procedures
U-BLR02/-/F02	96	record keeping/maintenance procedures
U-00009/00009/09N	65	monitoring of process or control device parameters as surrogate
U-00009/00009/09N	66	intermittent emission testing
U-00013/-/N13	70	monitoring of process or control device parameters as surrogate
U-00013/-/N13	71	intermittent emission testing
U-00014/00014/N14	75	intermittent emission testing
U-00014/00014/N14	76	monitoring of process or control device parameters as surrogate
U-00015/00015/N15	80	monitoring of process or control device parameters as surrogate
U-00015/00015/N15	81	intermittent emission testing
U-00016/00016/N16	85	intermittent emission testing
U-00019/00019	1-8	intermittent emission testing
U-00019/00019	1-9	record keeping/maintenance procedures
U-00019/00019	1-10	record keeping/maintenance procedures
U-00016/00016/N16	86	record keeping/maintenance procedures
U-00019/00019	1-11	record keeping/maintenance procedures
U-00019/00019	1-12	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
U-00007	54	monitoring of process or control device parameters as surrogate
U-00007	55	monitoring of process or control device parameters as surrogate
U-00007/00007	57	intermittent emission testing
U-00008	58	intermittent emission testing
U-00008	59	monitoring of process or control device parameters as surrogate
U-00008	60	monitoring of process or control device parameters as surrogate
U-00009/00009	62	monitoring of process or control device parameters as surrogate
U-00009/00009/009	63	intermittent emission testing
U-00013/-/013	67	intermittent emission testing
U-00013/-/013	68	monitoring of process or control device parameters as surrogate



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U-00014/00014	72	monitoring of process or control device parameters as surrogate
U-00014/00014/014	73	intermittent emission testing
U-00015/00015	77	monitoring of process or control device parameters as surrogate
U-00015/00015/015	78	intermittent emission testing
U-00016/00016	82	monitoring of process or control device parameters as surrogate
U-00016/00016/016	84	intermittent emission testing
U-00007	56	monitoring of process or control device parameters as surrogate
U-00008	61	monitoring of process or control device parameters as surrogate
U-00009/00009/009	64	monitoring of process or control device parameters as surrogate
U-00013/-/013	69	monitoring of process or control device parameters as surrogate
U-00014/00014/014	74	monitoring of process or control device parameters as surrogate
U-00015/00015/015	79	monitoring of process or control device parameters as surrogate
U-00016/00016	83	monitoring of process or control device parameters as surrogate
U-00019/00019	1-7	monitoring of process or control device parameters as surrogate
FACILITY	24	work practice involving specific operations
FACILITY	25	work practice involving specific operations
FACILITY	110	work practice involving specific operations
FACILITY	111	work practice involving specific operations
FACILITY	26	record keeping/maintenance procedures
U-00001/00001	50	monitoring of process or control device parameters as surrogate
U-00001/00001	51	intermittent emission testing
U-00001	48	monitoring of process or control device parameters as surrogate
U-BLR02/00017/F02	103	monitoring of process or control device parameters as surrogate
U-BLR02/00017/F03	104	monitoring of process or control device parameters as surrogate
U-BLR02/00018/F02	105	monitoring of process or control device parameters as surrogate
U-BLR02/00018/F03	106	monitoring of process or control device parameters as surrogate
U-00001	49	intermittent emission testing
U-BLR02/-/F02/NG002	97	record keeping/maintenance procedures
U-BLR02/-/NG2/NG002	100	record keeping/maintenance procedures

Basis for Monitoring

Condition 5 requires reporting of compliance monitoring every six based on the requirements of 6 NYCRR Part 201-6.5(c)(3)(ii) and 40 CFR 70.6(a)(3)(iii).

Condition 6 requires annual reporting of compliance status of each individual permit condition based on the requirements of 6 NYCRR Part 201-6.5(e) and 40 CFR 70.6(c)(5).

Condition 7 requires the submission of a statement of actual emissions based on the requirements of 6 NYCRR Part 202-2.1 and 40 CFR 70.9(a) and (b)(2).

Conditions 24, 25 and 111 specify limits for sulfur content in coal on a daily, three month and



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annual average as required in 6 NYCRR Part 225-1.2(a)(2).

Condition 26 requires keeping of specific fuel oil parameter records and submission to the Department on request based on 6 NYCRR Part 225-1.8(a).

Conditions 48,103, 104, 105 and 106 limit opacity emissions from coal fired boilers as required by 6 NYCRR Part 227-1.3(a).

Condition 49 requires a stack test and continuous monitoring of oxygen to demonstrate compliance with NOx RACT emission limits specified in 6 NYCRR Part 227-2.4 (c)(1)(iii)(‘b’).

Condition 50 limits the pressure drop on the bag house for particulate emission control on the coal fired boilers as required by 6 NYCRR Part 227-1.2(a)(4).

Condition 51 specifies the particulate emission limits and stack testing for the coal fired boilers as required by 6 NYCRR Part 227-1.2(a)(4).

Conditions 54 and 55 specify monitoring of wet scrubber operating parameters to demonstrate compliance with process particulate emission limit in 6 NYCRR Part 212.3(b).

Conditions 56, 61, 64, 69, 74, 79, 83 and 1-7 limit process opacity emissions based on 6 NYCRR Part 212.6(a).

Condition 57 requires stack testing at the descretion of the Department to demonstrate compliance with the process particulate emission limit in 6 NYCRR Part 212.3(b).

Condition 58 sets process particulate emission limits and requires stack testing at the descretion of the Department to demonstrate compliance with 6 NYCRR Part 212.4(a).

Conditions 59 and 60 specify monitoring of wet scrubber operating parameters to demonstrate compliance with process emission limits in 6 NYCRR Part 212.4(a).

Conditions 62, 68, 72, and 77 specify monitoring pressure drop across bag houses that control process particulate emissions as required by 6 NYCRR Part 212.4(c).

Conditions 63, 67, 73, 78 and 84 set process particulate emission limits and require testing at the descretion of the Department to demonstrate compliance with 6 NYCRR Part 212.4(c).

Conditions 65, 70, 76 and 80 set opacity emission limits and require certification of compliance at the descretion of the Department as required by 40 CFR 60.672.

Conditions 66, 71, 75, 81and 85 set particulate emission limits and require testing at the descretion of the Department to demonstrate compliance with 40 CFR 60.672.

Condition 82 specifies monitoring of wet scrubber liquid flow rate to control process particulate emissions as required by 6 NYCRR Part 212.4(c).

Condition 86 specifies monitoring of wet scrubber operating parameters to insure contol of particulate emissions as required by 40 CFR 60.676(d).

Condition 87 sets limits of sulfur content in fuel oil as specified in 40 CFR 60.42c(d).



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Condition 90 sets limits for opacity emissions as specified in 40 CFR 60.43c(c).

Condition 93 requires semiannual reporting of data to monitor compliance with SO₂ emission limits as specified in 40 CFR 60.48c(d).

Condition 94 requires record keeping to monitor sulfur content in fuel oil as specified in 40 CFR 60.48c(e)(11).

Condition 95 requires fuel supplier certification of sulfur content in fuel oil as specified in 40 CFR 60.48c(f)(1).

Condition 96 requires retention of fuel supplier sulfur in fuel certifications as specified in 40 CFR 60.48c(i).

Conditions 97 and 100 require an annual tune up for small boilers and record keeping to satisfy NO_x RACT requirements as specified in 6 NYCRR Part 227-2.4(d).

Conditions 99 and 102 require daily record keeping of fuel used in boilers as specified in 40 CFR 60.48c(g).

Condition 110 specifies limits for sulfur content of distillate fuel oil as required in 6 NYCRR Part 225-1.2(a)(2).

Condition 1-8 requires stack testing after process startup to demonstrate compliance with the particulate emission limits as specified in 40 CFR 60.672(a)

Condition 1-9 specifies accuracy, calibration and record keeping for monitoring devices used to monitor operation of wet scrubber used to control particulate emissions from EP 00019 as specified in 40 CFR 60.674(a).

Condition 1-10 requires record keeping and reporting operation of the wet scrubber used to control particulate emissions from EP 00019 as specified in 40 CFR 60.676(c).

Condition 1-11 requires reporting of significant deviations from wet scrubber monitoring parameters as specified in 40 CFR 60.676(d).

Condition 1-12 requires semiannual reporting of wet scrubber operation as specified in 40 CFR 60.676(e).