

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 8-4538-00003/00093 Renewal Number: 1



09/11/2007

Facility Identification Data

Name: EVANS CHEMETICS
Address: 228 E MAIN ST
WATERLOO, NY 13165

Owner/Firm

Name: EVANS CHEMETICS LP
Address: 33 WOOD AVE SOUTH
ISELIN, NJ 08830, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: ROGER T MCDONOUGH
Address: 6274 EAST AVON LIMA RD
AVON, NY 14414-9519

Division of Air Resources:
Name: FRANC GRABAR
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AVON, NY 14414
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Air Permitting Facility Owner Contact:
Name: STEVEN BRUSSO
Address: HAMPSHIRE CHEM/EVANS CHEMETICS
228 E MAIN ST
WATERLOO, NY 13165
Phone:3155399627

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

Title V permit renewal.

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Attainment Status

EVANS CHEMETICS is located in the town of WATERLOO in the county of SENECA. 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* ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

THE HAMPSHIRE CHEMICAL CORPORATION/EVANS CHEMETICS FACILITY IS LOCATED IN WATERLOO, SENECA COUNTY, NEW YORK ALONG THE CAYUGA AND SENECA CANAL. THE FACILITY MANUFACTURES DIVALENT ORGANIC SULFUR CHEMICAL INTERMEDIATES USED IN THE COSMETIC, PHARMACEUTICAL, AND PLASTICS INDUSTRIES. PRODUCTS ARE TYPICALLY MANUFACTURED IN BATCH OPERATIONS. TWO BOILERS PROVIDE PROCESS AND HEATING STEAM FOR THE FACILITY.

Permit Structure and Description of Operations

The Title V permit for EVANS CHEMETICS 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

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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.

EVANS CHEMETICS is defined by the following emission unit(s):

Emission unit 1BOILR - THIS EMISSION UNIT CONSISTS OF TWO BOILERS THAT PROVIDE PROCESS AND HEATING STEAM TO THE FACILITY. UNIT D HAS RATED HEAT INPUT OF 14.4 MMBTU/HR AND CAN FIRE NATURAL GAS OR NO. 6 FUEL OIL UNIT E HAS A RATED HEAT INPUT OF 44.3 MMBTU/HR AND CAN FIRE NATURAL GAS. ALL BOILERS EXHAUST TO A COMMON STACK, EP00124.

Emission unit 1BOILR is associated with the following emission points (EP):
00124

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

Process: GAS is located at 1ST FLOOR, Building 001 - THIS PROCESS IS NATURAL GAS COMBUSTION IN A BOILER. THIS PROCESS APPLIES TO UNIT D AND/OR UNIT E. APPLICABLE REQUIREMENTS SPECIFIED FOR THIS PROCESS APPLY TO EACH BOILER INDIVIDUALLY. UNIT D IS RATED AT 14.4 MMBTU/HR AND UNIT E IS RATED AT 44.3 MMBTU/H R.

Emission unit 1PROCS - THIS EMISSION UNIT CONSISTS OF ALL REGULATED EMISSION SOURCES ASSOCIATED WITH THE PRODUCTION AND STORAGE OF CHEMICALS AND RELATED ACTIVITIES. EMISSION SOURCES CONSIST OF RAW MATERIAL AND PRODUCT STORAGE TANKS, REACTORS, RECEIVERS, AND OTHER PROCESS VESSELS; AND AN OVEN ROOM DRYER. SOME EMISSIONS ARE CONTROLLED BY EMISSIONS SCRUBBER SYSTEMS, OTHER EMISSIONS ARE UNCONTROLLED. EMISSIONS MAY VENT THROUGH DIRECT PROCESS EXHAUSTS, THROUGH GENERAL VENTILATION EXHAUSTS, OR MAY BE FUGITIVE.

Emission unit 1PROCS is associated with the following emission points (EP):

00125, 00201, 00202, 00209, 00215, 00235, 00236, 00240, 00304, 00305, 00403, 00404, 00410, 00416, 01004, 01006, 01601, 01602, 2AB08, 2AB18, 2AB23, 57901, 57902, 57903, 57908, HT009, HT013, HT050, HT056, HT092, HT097, HT104

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

Process: PR1 is located at ALL FLOORS - THIS PROCESS IS THE PRODUCTION AND STORAGE OF CHEMICALS AND ASSOCIATED ACTIVITIES. THIS PROCESS ACCOUNTS FOR ALL PRODUCTION RELATED ACTIVITIES AT THE FACILITY.

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Title V/Major Source Status

EVANS CHEMETICS is subject to Title V requirements. This determination is based on the following information:

Title V major.

Program Applicability

The following chart summarizes the applicability of EVANS CHEMETICS 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
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

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

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

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant

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and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

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

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

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

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

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

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

Compliance Status

Facility is in compliance with all requirements

SIC Codes



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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
2869	INDUSTRIAL ORGANIC CHEMICALS, NEC

SCC Codes

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

SCC Code	Description
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
3-99-999-93	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES Other Not Classified

Facility Emissions Summary

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

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Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000107-21-1	1,2-ETHANEDIOL (HAP)	> 0	but < 10 tpy
000096-27-5	1,2-PROPANEDIOL, 3-MERCAPTO-C3H8O2S	> 0	but < 2.5 tpy
000112-72-1	1,-TETRADECANOL	> 0	but < 2.5 tpy
000112-53-8	1-DODECANOL C12H26O	> 0	but < 2.5 tpy
000108-31-6	2,5 - FURANDIONE (HAP)	> 0	but < 10 tpy
000141-43-5	2-AMINOETHANOL	> 0	but < 2.5 tpy
000110-16-7	2-BUTENEDIOLIC ACID (Z) - C4H4O4	> 0	but < 2.5 tpy
000108-10-1	2-PENTANONE, 4-METHYL (HAP)	>= 10	tpy
001804-87-1	2-PROPANOIC ACID, 2-METHYL-,2 SULFOETHYL ESTER	> 0	but < 2.5 tpy
000079-41-4	2-PROPANOIC ACID,2-METHYL-(9CI)	> 0	but < 2.5 tpy
000112-80-1	9-OCTADECANOIC ACID C18H34O2	> 0	but < 2.5 tpy
004862-18-4	ACETAMIDE, 2,2',2" NITRILOBIS	> 0	but < 2.5 tpy
068223-93-8	ACETIC ACID, 2,2' DITHIOS, DIAMMONIUM SALT	> 0	but < 2.5 tpy
000123-93-3	ACETIC ACID, 2,2'THIOBIS	> 0	but < 2.5 tpy
000079-11-8	ACETIC ACID, CHLORO (HAP)	> 0	but < 10 tpy
000068-11-1	ACETIC ACID, MERCAPTO-C2H4O2S	> 0	but < 2.5 tpy
010193-99-4	ACETIC ACID, MERCAPTO 2,2' BIS [(MERCAPTOACETYL)OXY]METHYL] 1,3, PROPAN	> 0	but < 2.5 tpy
025103-09-7	ACETIC ACID, MERCAPTO-, ISOCTYL ESTER	>= 2.5	tpy but < 10 tpy
005421-46-5	ACETIC ACID, MERCAPTO-, MONOAMMONIUM SALT	> 0	but < 2.5 tpy
030618-84-9	ACETIC ACID, MERCAPTO, MONOESTER w/ 1,2,3 PROPANETRIOL	> 0	but < 2.5 tpy
000126-97-6	ACETIC ACID, MERCAPTO, W/ 2-AMINO ETHANOL	> 0	but < 2.5 tpy
000123-81-9	ACETIC ACID, MERCAPTO-,1,2-ETHANEDIYL ESTER	> 0	but < 2.5 tpy
068845-30-7	ACETIC ACID, MERCAPTO-, ISODECYL ESTER	> 0	but < 2.5 tpy
010047-28-6	ACETIC ACID, MERCAPTO-BUTYL ESTER	> 0	but < 2.5 tpy
007327-60-8	ACETONITRILE, 2,2',2" NITROTRIS	> 0	but < 2.5 tpy
068526-86-3	ALCOHOLS, C11-14-ISO, C13-RICH	> 0	but < 2.5 tpy
007664-41-7	AMMONIA	>= 10	tpy but < 25 tpy
012125-02-9	AMMONIUM CHLORIDE	> 0	but < 2.5 tpy
007440-36-0	ANTIMONY (HAP)	> 0	but < 10 tpy
007440-38-2	ARSENIC (HAP)	> 0	but < 10 tpy
000095-53-4	BENZENAMINE, 2-METHYL (HAP)	> 0	but < 10 tpy
000071-43-2	BENZENE (HAP)	> 0	but < 10 tpy
000098-88-4	BENZOYL CHLORIDE	> 0	but < 2.5 tpy
007440-41-7	BERYLLIUM (HAP)	> 0	but < 10 tpy
000071-36-3	BUTANOL	> 0	but < 2.5 tpy
068526-85-2	C-9,C-10 ALOCOHOLS	> 0	but < 2.5 tpy
007440-43-9	CADMIUM (HAP)	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 25	tpy but < 40 tpy
000056-23-5	CARBON TETRACHLORIDE (HAP)	> 0	but < 10 tpy
000096-24-2	CHLORO,3- -1, 2-PROPANEDIOL	> 0	but < 2.5 tpy

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000067-66-3	CHLOROFORM (HAP)	> 0 but < 10 tpy
007440-47-3	CHROMIUM (HAP)	> 0 but < 10 tpy
007440-48-4	COBALT (HAP)	> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE (HAP)	> 0 but < 10 tpy
000693-36-7	DISTEARYL THIOPROPIONATE	> 0 but < 2.5 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO (HAP)	> 0 but < 10 tpy
001942-52-5	ETHANETHIOL, 2- (DIETHYLAMI NO) -HYDROCHLORIDE	> 0 but < 2.5 tpy
015535-29-2	ETHANOL, 2-AMINO, SULFATE	> 0 but < 2.5 tpy
000077-99-6	ETHRIOL	> 0 but < 2.5 tpy
000100-41-4	ETHYLBENZENE (HAP)	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	> 0 but < 10 tpy
000056-81-5	GLYCEROL	> 0 but < 2.5 tpy
0NY100-00-0	HAP	>= 40 tpy but < 50 tpy
036653-82-4	HEXADECANOL, 1-	> 0 but < 2.5 tpy
000110-54-3	HEXANE (HAP)	> 0 but < 10 tpy
000124-04-9	HEXANEDIOIC ACID	> 0 but < 2.5 tpy
028301-90-8	HEXANEDIOIC ACID, POLYMER W/ 2-ETHYL (HYDROXYMETHYL) PROPANEDIOL	> 0 but < 2.5 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)	> 0 but < 10 tpy
007722-84-1	HYDROGEN PEROXIDE	> 0 but < 2.5 tpy
007783-06-4	HYDROGEN SULFIDE	> 0 but < 2.5 tpy
026952-21-6	ISOOCTANOL	> 0 but < 2.5 tpy
000067-63-0	ISOPROPYL ALCOHOL	> 0 but < 2.5 tpy
007439-92-1	LEAD (HAP)	> 0 but < 10 tpy
007439-96-5	MANGANESE (HAP)	> 0 but < 10 tpy
007439-97-6	MERCURY (HAP)	> 0 but < 10 tpy
000075-75-2	METHANESULFONIC ACID	> 0 but < 2.5 tpy
000112-92-5	N-1-OCTADECANOL	> 0 but < 2.5 tpy
000091-20-3	NAPHTHALENE (HAP)	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	199000
000106-89-8	OXIRANE, (CHLOROMETHYL) (HAP)	> 0 but < 10 tpy
0NY075-00-0	PARTICULATES	>= 50 tpy but < 100 tpy
025167-80-0	PHENOL, CHLORO-	> 0 but < 2.5 tpy
007723-14-0	PHOSPHORUS (YELLOW) (HAP)	> 0 but < 10 tpy
0NY075-00-5	PM-10	>= 50 tpy but < 100 tpy
009004-95-9	POLY(OXY-1,2, ETHANDIYL) ALPHA HEXADECYL, OMEGA HYDROXY	> 0 but < 2.5 tpy
000111-97-7	PROPANENITRILE, 3,3' THIOBIS	> 0 but < 2.5 tpy
033007-83-9	PROPANOIC ACID, 3- MERCAPTO, 2- ETHYL -2 [(3-MER CAPTO-1-OXYPROPOXY) . . .	> 0 but < 2.5 tpy
016215-21-7	PROPANOIC ACID, 3 MERCAPTO, BUTYL ESTER	> 0 but < 2.5 tpy
000123-28-4	PROPANOIC ACID, 3, 3' THIOBIS - DIDODECYL ESTER	> 0 but < 2.5 tpy
006729-96-0	PROPANOIC ACID, 3,3'	> 0 but < 2.5 tpy
001119-62-6	DITHIOBIS, DIOCTADECYL ESTER PROPANOIC ACID, 3,3'	> 0 but < 2.5 tpy
000111-17-1	DITHIOSBIS PROPANOIC ACID, 3,3' THIOBIS	> 0 but < 2.5 tpy
016545-54-3	PROPANOIC ACID, 3,3' THIOBIS, DIETRADECYL ESTER	> 0 but < 2.5 tpy
013103-52-1	PROPANOIC ACID, 3- [(3-DODECYLOXY) -3 OXOPROPYL] THIO] OCTADECYL	> 0 but < 2.5 tpy
000107-96-0	PROPANOIC ACID, 3-MERCAPTO	> 0 but < 2.5 tpy
007575-23-7	PROPANOIC ACID, 3-MERCAPTO,	> 0 but < 2.5 tpy

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	2,2' BIS[(3-MERCAPTO-1- OXO PROXY) METH...	
030374-01-7	PROPANOIC ACID, 3-MERCAPTO, ISOCTYL ESTER	>= 10 tpy but < 25 tpy
022504-50-3	PROPANOIC ACID, 3-MERCAPTO-1,2 ETHANEDIYL ESTER	> 0 but < 2.5 tpy
000107-13-1	PROPENITRILE (HAP)	> 0 but < 10 tpy
000079-42-5	PROPENOIC ACID, 2-MERCAPTO	> 0 but < 2.5 tpy
031778-15-1	PROPENOIC ACID, 3 MERCAPTO, OCTADECYL ESTER	> 0 but < 2.5 tpy
007782-49-2	SELENIUM (HAP)	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy
007664-93-9	SULFURIC ACID	>= 2.5 tpy but < 10 tpy
000108-88-3	TOLUENE (HAP)	> 0 but < 10 tpy
000079-01-6	TRICHLOROETHYLENE (HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	99000
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part

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201-1.10(b)

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

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

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

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

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

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

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

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

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

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

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

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conditions of this permit.

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

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

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

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

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

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

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inspect and monitor the facility.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal,

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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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

Regulatory Analysis

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Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	48
1-BOILR/-/GAS/UNITF	40CFR 60-Dc.48c(g)	Reporting and Recordkeeping Requirements.	27
1-BOILR/-/GAS/UNITF	40CFR 60-Dc.48c(i)	Reporting and Recordkeeping Requirements.	28
FACILITY	40CFR 68	Chemical accident prevention provisions	21
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	22
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	2
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	49
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	3
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	4
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	5
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	6
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 25, 26
FACILITY	6NYCRR 201-6.5(a) (4)	General conditions	7
FACILITY	6NYCRR 201-6.5(a) (7)	General conditions	
Fees 8			
FACILITY	6NYCRR 201-6.5(a) (8)	General conditions	9
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	15
FACILITY	6NYCRR 201-6.5(c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	16
FACILITY	6NYCRR 201-6.5(c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	17
FACILITY	6NYCRR 201-6.5(d) (5)	Compliance schedules	10
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	18
FACILITY	6NYCRR 201-6.5(f)	Operational flexibility	24
FACILITY	6NYCRR 201-6.5(f) (6)	Off Permit Changes	11
FACILITY	6NYCRR 201-7.2	Emission capping using synthetic minor permits.	50, 51, 52
FACILITY	6NYCRR 202-1.1	Required emissions tests.	12
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	19
FACILITY	6NYCRR 202-2.5	Emission Statements -	20

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		record keeping requirements.	
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	53
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	13
FACILITY	6NYCRR 212.10	NOx and VOC RACT required at major facilities	51
1-PROCS/00235	6NYCRR 212.4 (a)	General Process Emission Sources - emissions from new sources and/or modifications	34
1-PROCS/00240	6NYCRR 212.4 (a)	General Process Emission Sources - emissions from new sources and/or modifications	36
1-PROCS/2AB23	6NYCRR 212.4 (a)	General Process Emission Sources - emissions from new sources and/or modifications	47
1-PROCS/01006	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	43
1-PROCS/2AB18	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	46
1-PROCS/01602	6NYCRR 212.5 (d)	Applicable emission standards	44
1-PROCS	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	29
FACILITY	6NYCRR 215	Open Fires	14
FACILITY	6NYCRR 227-2	Reasonably available control technology for NOx	52
1-PROCS/00201	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	30
1-PROCS/00202	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	31
1-PROCS/00209	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	32
1-PROCS/00215	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	33
1-PROCS/00235	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	35
1-PROCS/00240	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	37
1-PROCS/00305	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	38
1-PROCS/00403	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	39
1-PROCS/00404	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	40
1-PROCS/00410	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	41
1-PROCS/00416	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	42
1-PROCS/01602	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	45

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Applicability Discussion:

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

ECL 19-301.

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

6NYCRR Part 200-.6

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

6NYCRR Part 200-.7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)



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

6NYCRR Part 201-6

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

6NYCRR 201-6.5(a)(4)

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

6NYCRR 201-6.5(a)(7)

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

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

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also be certified by the designated responsible official of the facility.

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

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

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

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

6NYCRR 201-6.5(d)(5)

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

6NYCRR Part 201-6.5(e)

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

6NYCRR 201-6.5(f)(6)

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

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must

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retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

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

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, EVANS CHEMETICS has been determined to be subject to the following regulations:

40CFR 60-Dc.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.

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40CFR 60-Dc.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.

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

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

6NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 201-7.2

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

6NYCRR 212 .10

This rule outlines the requirements of VOC RACT (Reasonably Available Control Technology)

6NYCRR 212 .4 (a)

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

6NYCRR 212 .4 (c)

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

6NYCRR 212 .5 (d)

This section specifies that if best available control technologies are implemented the commissioner may specify, under certain situations, a less restrictive emission rate.

6NYCRR 212 .6 (a)

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

6NYCRR 227-2

This regulation limits the emission of oxides of nitrogen (NO_x) from stationary combustion installations (boilers, combustion turbines and internal combustion engines).

6NYCRR 257-10

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This rule outlines the Ambient Air Quality Standard for Hydrogen Sulfide (H2S) of 0.01 ppm.

Compliance Certification

Summary of monitoring activities at EVANS CHEMETICS:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
1-BOILR/-/GAS/UNITF	record keeping/maintenance procedures	27
1-BOILR/-/GAS/UNITF	record keeping/maintenance procedures	28
FACILITY	record keeping/maintenance procedures	17
FACILITY	record keeping/maintenance procedures	18
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	51
FACILITY	record keeping/maintenance procedures	52
FACILITY	record keeping/maintenance procedures	19
1-PROCS/00235	record keeping/maintenance procedures	34
1-PROCS/00240	record keeping/maintenance procedures	36
1-PROCS/2AB23	record keeping/maintenance procedures	47
1-PROCS/01006	record keeping/maintenance procedures	43
1-PROCS/2AB18	record keeping/maintenance procedures	46
1-PROCS/01602	record keeping/maintenance procedures	44
1-PROCS	record keeping/maintenance procedures	29
1-PROCS/00201	record keeping/maintenance procedures	30
1-PROCS/00202	record keeping/maintenance procedures	31
1-PROCS/00209	record keeping/maintenance procedures	32
1-PROCS/00215	record keeping/maintenance procedures	33
1-PROCS/00235	record keeping/maintenance procedures	35
1-PROCS/00240	record keeping/maintenance procedures	37
1-PROCS/00305	record keeping/maintenance procedures	38
1-PROCS/00403	record keeping/maintenance procedures	39
1-PROCS/00404	record keeping/maintenance procedures	40
1-PROCS/00410	record keeping/maintenance procedures	41
1-PROCS/00416	record keeping/maintenance procedures	42
1-PROCS/01602	record keeping/maintenance procedures	45

Basis for Monitoring

Conditions 16 through 21, 23 through 28, and 31 all require monitoring to ensure compliance with the Ambient Air Quality Standard of 0.01 ppm for Hydrogen Sulfide.

Conditions 20, 22, and 33 require monitoring to ensure that certain limits for the emissions of propenenitrile, ammonia, and Hydrogen Chloride, respectively, are met. These limits have been established in accord with 6NYCRR, Part212.4(a).

Conditions 29 and 32 both require monitoring for the 0.05 gr/dscf standard in 6NYCRR, Part 212.4(c).