

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 9-1464-00164/00117    Modification Number: 4**



**09/07/2005**

**Facility Identification Data**

Name: 3M TONAWANDA  
Address: 305 SAWYER AVE  
TONAWANDA, NY 14150

**Owner/Firm**

Name: 3M CO  
Address: 3M CENTER BOX 33331  
SAINT PAUL, MN 55133-3331, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
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Air Permitting Contact:  
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TONAWANDA, NY 14150  
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**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

Permit modification for the addition of a thermal Oxidizer to Emission Point SEPAR to control Volatile Organic Compound (VOC) emissions. SEPAR is the new Wet Air Oxidation process that replaced B-

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squared. Wet air was permitted under permit modification #1. The addition of the control equipment will be considered a minor modification because the sole purpose is to reduce emissions and not to change the process. The emissions of concern are Acrolein which was not identified in the initial submission and Acetaldehyde which was emitted at a rate higher than originally estimated. The violations were addressed in a consent order.

### Attainment Status

3M TONAWANDA is located in the town of TONAWANDA in the county of ERIE. 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*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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

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

### Facility Description

This facility produces cellulose sponges by a stepwise batch process. Emission sources include viscose shredders, sponge mixers, coagulation, purification lines, and salt recovery. Associated sources include boilers for steam and heat production, storage tanks, and sources related to processing reinforcing fibers and additives.

### Permit Structure and Description of Operations

The Title V permit for 3M TONAWANDA 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

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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.

3M TONAWANDA is defined by the following emission unit(s):

Emission unit USEPAR - The process technology converts contaminants in the salt reclamation process by oxidation to sulfate and carbon dioxide. The B2 process, including the accompanying scrubber and BOIL4, will be replaced by this U-SEPAR process technology. The most important condition that applies to the B2 process which will still be applicable once USEPAR is operable is the 71.26 tons of Sulfur Dioxide per year emission limit under 40 cfr 52.21, subpart A, the 337.9 ton of VOC per year limit under 6 NYCRR part 231-2, and the 33.12 tons of Hydrogen Sulfide per year emission limits under 40 cfr 52.21, subpart A. These limits are applicable to B2 and the new technology.

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

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

Process: SEP is located at Building CUC - The process technology converts contaminants in the waste liquor under pressure and temperature to sulfate and carbon dioxide.

Emission unit USBOIL - Package boiler to provide steam for the new solvent recovery unit. Dual fuel boiler with natural gas as the primary fuel and no. 2 fuel oil as the secondary fuel. The maximum rated heat input is 9.6 mmbtu/hr.

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

Process: SB2 is located at MAIN, Building CUC - COMBUSTION OF NO. 2 FUEL OIL IN THE SOLVENT RECOVERY UNIT BOILER. THE BOILER PROVIDES STEAM TO THE SOLVENT RECOVERY UNIT AND HAS A MAXIMUM HEAT INPUT OF 9.6 MMBTU/HR. NO. 2 FUEL OIL IS THE BACKUP FUEL.

Process: SBN is located at MAIN, Building CUC - COMBUSTION OF NATURAL GAS IN THE SOLVENT RECOVERY UNIT BOILER. THE BOILER PROVIDES STEAM TO THE SOLVENT RECOVERY UNIT AND HAS A MAXIMUM HEAT INPUT OF 9.6 MMBTU/HR. NATURAL GAS IS THE PRIMARY FUEL.

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Emission unit UNCS01 - This unit vents to emission point NCS01 (main stack) and consists of low concentration emission sources associated with sponge manufacturing, sources vented to the solvent recovery unit, and the B2 process. Uncontrolled sources include viscose holding equipment, sponge block, ML washes, evaporator concentrating weak ML and laminator wash tables. Sources venting to the solvent recovery unit include: the laminator acid washes, the viscose shredders, the block sponge mixers, the EC oven and reclaimed viscose/sponge cook tanks. The emissions from the B2 process are abated by a heat recovery industrial boiler and caustic scrubber. The emissions from the scrubber are vented to emission point NCS01.

Emission unit UNCS01 is associated with the following emission points (EP):

NCS01

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

Process: NCS is located at MAIN, Building LCEMS - This process vents to emission point NCS01 (main stack) and includes low concentration emission sources associated with sponge manufacturing. The sources venting to the SRU (Solvent Recovery System) are also part of this process.

Process: WAO is located at Building LCEMS - The process technology converts contaminants in the waste liquor under pressure and temperature to sulfate and carbon dioxide. This process vents to emission point NCS01 only when in bypass which is defined in the Start up, shutdown and malfunction plan.

Emission unit UBOILS - Two new boilers will be installed to supply steam for plant use and will replace Boilers identified in emission unit UTHERM. The new boilers are rated for: 63.2 mmBTU/hr when burning No. 2 oil and 60.4 mmBTU/hr when burning natural gas. Upon start up of UBOILS and shutdown of UTHERM conditions applicable for monitoring plant wide Sulfur dioxide emissions under 40 cfr 52.21, subpart A, will apply to UBOILS. Once UTHERM is shut down conditions applicable to UTHERM such as the particulate standard under 6 NYCRR part 227.2(b)(1) and the sulfur standards under 6 NYCRR 225-1.2 will no longer apply.

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

BOIL1, BOIL2

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

Process: 278 is located at Building CUC - Emission Source BOI01 and BOI02, two boilers rated at 60.4 mmbtu/hr boilers when firing natural gas as primary fuel.

Process: 279 is located at Building CUC - Emission Source BOI01 and BOI02, 2 boilers, firing on # 2 low sulfur oil as backup to natural gas use.

Emission unit UCONVT - The emission unit consists of coaters used to apply adhesive. The coater also utilizes a heating unit.

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

BND00

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

Process: 277 is located at main, Building 1-34 - This process consists of coaters used to apply adhesive. One of the coaters also utilizes a heater.

Emission unit UTANKS - This emission unit includes the non-exempt storage tanks at the facility. The carbon disulfide tank utilizes a water blanket to control emissions and is not subject to the requirements

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of 40 cfr 60 subpart Kb.

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

ACID3, BL004, CS20A, CS20B, CS20C, NAOH7, NO600

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

Process: 266 is located at GROUND ELEVATION, Building TANKS - The NaOH7, ACID3, BLOO4, NO600 tanks each have one emission point associated with them, the CS203 tank has three. CS20A is the manway in the top of the tank, CS20B is the overflow pipe and CS20C is the dike where displaced water is aerated to remove carbon disulfide. Emissions from NAOH7 and NO600 (tank B9) are insignificant. The emissions from CS203 are included in the process emission summary. NO600 may be used to store no.6 fuel oil or no.2 fuel oil.

Emission unit U THERM - Three boilers with natural gas as primary fuel. # 6 and #2 oil backup.

Boilers 1 and 2 are each rated at 10 mmbtu/hr heat input, boiler 3 is rated at 20.9 mmbtu/hr.

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

E0000

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

Process: 253 is located at MAIN FLOOR, Building 1-30 - Combustion of natural gas in three boilers as the primary fuel. Boilers 1 and 2 are each rated at 10 mmbtu/hr, boiler 3 at 20.9 mmbtu/hr..

Process: 254 is located at MAIN FLOOR, Building 1-30 - Combustion of no.2 fuel oil in three boilers as backup fuel. Boilers 1 and 2 are each rated at 10 mmbtu/hr, boiler 3 at 20.9 mmbtu/hr.

Process: 255 is located at main floor, Building 1-30 - Combustion of No. 6 oil in three boilers as backup fuel

Emission unit UMAKOT - Existing sponge making consists of viscose/salt production and block making. This emission unit consists of the sources associated with sponge making that do not vent to the main stack (NCS01).

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

AGERM, B3000, FN000, FS000, MMIX1, MMIX2, MMIX3, SLG00

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

Process: OTH is located at MAIN, Building LCENMS - Sources in the sponge making process that do not vent to the main stack include: block mixer secondary exhausts, the sulfur sludge tank and the B3 tank. Particulate emissions from the two sponge mixer secondary exhausts, FN000, FS000, and FB000 are controlled by panel filters, fnpan, and fspan respectively. The other sources are uncontrolled. These sources are located on the main floor of buildings 1-21 sponge mixer area, and 1-29 sludge building. Sources associated with the laminators include the mass mixers (00110, 00111, 00112, 00113, 0 0114, 00115, 00116, 00117, 00118) and the viscose ageing room (00090). All of these sources will be located on the first floor of the laminator building and are uncontrolled.

Emission unit UPUMP0 - Diesal fuel powered backup pump.

Emission unit UPUMP0 is associated with the following emission points (EP):

PUMP0

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

Process: PMP is located at MAIN FLOOR, Building FPH1 - Diesel powered backup pump. This is an exempt source, but it is subject the opacity requirements in 6 nycrr part 227. Actual emissions are less than 2.5 tons per year.

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Emission unit UPTSCL - Three exempt parts cleaners. These sources are exempt, but are subject to an applicable requirement. They are not directly connected to a stack, so no emission point is included.

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

Process: PCL is located at MAIN, Building MAINT - Three parts cleaners. These are exempt sources because they use a solvent with a boiling point of over 300 degrees fahrenheit.

**Title V/Major Source Status**

3M TONAWANDA is subject to Title V requirements. This determination is based on the following information:

3M Tonawanda is considered major for emissions of Volatile Organic Compounds and Hazardous Air Pollutants in excess of the major source thresholds of 50 and 10 tons per year respectively. Carbon Disulfide is the predominant contaminant emitted which is both a Volatile Organic Compound and a Hazardous Air Pollutant.

**Program Applicability**

The following chart summarizes the applicability of 3M TONAWANDA with regards to the principal air pollution regulatory programs:

<b>Regulatory Program</b>	<b>Applicability</b>
PSD	YES
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	YES
SIP	YES

**NOTES:**

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to

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major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

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

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

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

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

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

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

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

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

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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
2821	PLASTICS MATERIALS AND RESINS

### SCC Codes

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

SCC Code	Description
3-01-810-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - GENERAL PROCESSES Air Oxidation Units
3-01-870-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL STORAGE (FIXED ROOF TANKS)
1-03-005-02	HYDROCHLORIC ACID: BREATHING LOSS_** (USE 3-01-870-33) EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL
1-03-005-01	10-100MMBTU/HR ** EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL
1-03-006-02	Grades 1 and 2 Oil EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
1-02-005-01	10-100 MMBtu/Hr EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL
1-02-006-02	Grades 1 and 2 Oil EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS

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1-02-004-02	10-100 MMBtu/Hr EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL
3-09-011-01	10-100MMBTU/HR ** FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - CONVERSION COATING OF METAL PRODUCTS
3-02-032-01	Alkaline Cleaning Bath FOOD AND AGRICULTURE FOOD AND AGRICULTURE - BAKERIES
2-03-001-07	Bread Baking: Sponge-Dough Process INTERNAL COMBUSTION ENGINES - COMMERCIAL/INSTITUTIONAL COMMERCIAL/INSTITUTIONAL IC ENGINE - DISTILLATE OIL (DIESEL)
3-07-004-06	RECIPROCATING: EXHAUST PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PULPBOARD MANUFACTURE PULP & PAPER BOARD: MULTI-EFFECT EVAPORATOR/DRYER
4-02-013-10	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING COATING APPLICATION: KNIFE COATER

**Facility Emissions Summary**

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000075-07-0	ACETALDEHYDE (HAP)	1103.8	
000107-02-8	ACROLEIN (HAP)	73.6	
007664-41-7	AMMONIA		>= 2.5 tpy but < 10 tpy
000075-15-0	CARBON DISULFIDE (HAP)	743285	
000630-08-0	CARBON MONOXIDE		>= 10 tpy but < 25 tpy



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000463-58-1	CARBONYL SULFIDE (HAP)	>= 10 tpy
0NY100-00-0	HAP	>= 250 tpy
007783-06-4	HYDROGEN SULFIDE	66240
007439-92-1	LEAD (HAP)	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 25 tpy but < 40 tpy
0NY075-00-0	PARTICULATES	>= 2.5 tpy but < 10 tpy
0NY075-00-5	PM-10	>= 2.5 tpy but < 10 tpy
007446-09-5	SULFUR DIOXIDE	142520
007664-93-9	SULFURIC ACID	32000
0NY998-00-0	VOC	>= 250 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 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

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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 - 6 NYCRR Part 201-6.5(a)(5)**

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

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

This permit does not convey any property rights of any sort or any

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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

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following circumstances:

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

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

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

**Item L:**

**Permit Exclusion - ECL 19-0305**

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

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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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>	<b>Condition</b>
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect	1-13

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FACILITY	40CFR 52-A.21	to air pollution control Prevention of Significant Deterioration	4-11, 4-12, 4-13, 4-14
U-BOILS/-/279	40CFR 60-A.11(e) (1)	General provisions - compliance with standards and maintenance requirements	1-7
U-BOILS	40CFR 60-A.7(a)	Notification and Recordkeeping	1-9
U-BOILS	40CFR 60-Dc.42c(d)	Standard for Sulfur Dioxide Firing Oil. (see narrative)	1-6
U-BOILS/-/279	40CFR 60-Dc.44c(h)	Alternative Compliance and Performance Test Methods and Procedures for Sulfur Dioxide.	1-8
FACILITY	40CFR 68	Chemical accident prevention provisions	4-6
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	70
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 38, 39
U-NCS01/NCS01/NCS/SCRUB	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	60, 61, 62
FACILITY	6NYCRR 201-6.5(a) (4)	General conditions	4-2
FACILITY	6NYCRR 201-6.5(a) (7)	General conditions	
Fees 4-1			
FACILITY	6NYCRR 201-6.5(a) (8)	General conditions	4-3
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-1
FACILITY	6NYCRR 201-6.5(c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-2
FACILITY	6NYCRR 201-6.5(c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-3
FACILITY	6NYCRR 201-6.5(d) (5)	Compliance schedules	4-4
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	1-4
FACILITY	6NYCRR 201-6.5(f) (6)	Off Permit Changes	4-5
FACILITY	6NYCRR 201-6.5(g)	Permit shield	27
FACILITY	6NYCRR 201-7	Federally-Enforceable Emission Caps	4-10, 4-11, 4-12, 4-13, 4-14
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	29
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	30
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	74
U-MAKOT	6NYCRR 212.10	NOx and VOC RACT required at major facilities	44



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U-NCS01	6NYCRR 212.10	NOx and VOC RACT required at major facilities	2-6
U-SEPAR/SEPAR	6NYCRR 212.10 (c) (4) (i)	NOx and VOC RACT required at major facilities	1-10, 1-11, 1-12
U-SEPAR	6NYCRR 212.11	Sampling and monitoring	4-7
U-SEPAR/SEPAR	6NYCRR 212.11 (b) (1)	Sampling and monitoring	4-9
U-NCS01/NCS01/NCS/ONSRU	6NYCRR 212.11 (b) (3)	Sampling and monitoring	2-12
U-NCS01/NCS01/NCS/BOIL4	6NYCRR 212.11 (b) (5)	Sampling and monitoring	58, 59
U-MAKOT/-/OTH	6NYCRR 212.4	General Process Emission Sources - emissions from new sources and/or modifications	2-5
U-NCS01/NCS01/NCS/000C1	6NYCRR 212.4	General Process Emission Sources - emissions from new sources and/or modifications	54
U-NCS01/NCS01/NCS/000C2	6NYCRR 212.4	General Process Emission Sources - emissions from new sources and/or modifications	55
U-SEPAR/SEPAR	6NYCRR 212.5 (d)	Applicable emission standards	4-8
U-NCS01/NCS01	6NYCRR 212.6	Opacity Limitation	2-7
U-NCS01/NCS01	6NYCRR 212.9	Tables.	2-8
U-NCS01/NCS01/NCS/SCRUB	6NYCRR 212.9 (b)	General Process Emission Sources - tables	63
U-THERM/E0000/254	6NYCRR 225-1.2	Sulfur in Fuel Limitations.	68, 69
U-PTSCL	6NYCRR 226.3 (a)	Cold cleaning degreasing	64
U-PTSCL	6NYCRR 226.4 (a)	Operating Requirements.	65
U-THERM	6NYCRR 227.2 (b) (1)	Particulate emissions.	67
U-BOILS	6NYCRR 227-1.2 (a) (2)	Particulate Emissions	1-14
		Firing Liquid Fuels Excluding Distillate Oil. (see narrative)	
U-CONVT/-/277	6NYCRR 228.7	Table 1	2-4
U-TANKS/CS20A/266/CS200	6NYCRR 229.3 (e)	Volatile organic liquid storage tanks	66
U-NCS01/NCS01	6NYCRR 257-10	Air Quality Standards - Hydrogen Sulfide	2-10

Applicability Discussion:

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

ECL 19-301.

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

6NYCRR Part 201-1.4

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

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6NYCRR Part 201-6

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

6NYCRR Part 201-6.5(c)

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

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

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

6NYCRR Part 201-6.5(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 Part 201-6.5(e)

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

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the

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federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-.2

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

40 CFR Part 68.

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

**Facility Specific Requirements**

In addition to Title V, 3M TONAWANDA has been determined to be subject to the following regulations:

40CFR 52-A.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .

40CFR 60-A.11 (e) (1)

This section details when the the facility must demonstrate initial compliance with the opacity standard.

40CFR 60-A.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. This applies to emission unit U BOILS (NSPS subpart Dc boilers).

40CFR 60-Dc.42c (d)

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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.

40CFR 60-Dc.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.

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 201-7

This subpart specifies how a source owner or operator may opt to avoid being subject to one or more applicable requirements to which the source or unit would have otherwise been subject, or where needed to establish an emission reduction credit by accepting federally-enforceable permit conditions restricting or capping emissions.

6NYCRR 212 .10

6 NYCRR part 212-10 requires Reasonably Available Control Technology for major sources of Volatile Organic Compound (VOC) emissions. 3M Tonawanda is major for VOC emissions and meets these requirements of 81% overall control by maintaining control equipment on the B Squared process and a Solvent Recovery unit on high concentration sources.

6NYCRR 212 .10 (c) (4) (i)

This regulation requires Reasonably Available Control Technology (RACT) for Volatile Organic Compound (VOC) emissions. Removal efficiency greater than 81% is considered RACT. Emission Unit NCS01 VOC emissions vent to a carbon adsorption system subject to this regulation. The unit maintains a continuous emission monitor and meets the 81% over all control requirement. A NESHAP regulation for sponge making is proposed and is less stringent than 6 NYCRR 212.10. VOC emissions from this plant are also considered a HAP. The proposed NESHAP will require 75% overall control.

6NYCRR 212 .11

This section sets the requirements for sampling, monitoring, recordkeeping, and reporting from process sources.

6NYCRR 212 .11 (b) (1)

This allows for the monitoring of temperature as a surrogate monitoring parameter to determine compliance with the 98% destruction efficiency for the Thermal Oxidizer.

6NYCRR 212 .11 (b) (3)

This portion of the regulation requires monitoring of the solvent recovery unit with continuous monitors and data recorders. 3M operates and maintains a Carbon Disulfide analyzer at the inlet and outlet of this control equipment.

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6NYCRR 212 .11 (b) (5)

This section allows for other parameters to be monitored if required by conditions on the permit to construct or certificate to operate for the source. The facility uses a thermal oxidizer and scrubber to control emissions from the B2 process. A oxygen sensor on the outlet of the boiler controls air to fuel ratio by adjusting make up air. Specific ranges are set in the permit.

6NYCRR 212 .4

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 .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

This section of the regulation allows for an equivalent opacity limit to be established exceeding the opacity standard of subdivision a in this section. The source owner must demonstrate through acceptable tests for such source that they are in compliance with all applicable emission requirements other than the opacity standard and the source and any associated emission control equipment is being being operated in a manner acceptable to the commissioner.

6NYCRR 212 .9

This section of the regulation contains the descriptions and definitions of the environmental ratings system and the tables which set the emission standards for each rating.

6NYCRR 212 .9 (b)

This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

6NYCRR 225-1.2

This regulation limits the amount of sulfur present in the fuel burned at the facility.

6NYCRR 226 .3 (a)

This reference requires cold cleaning degreasers to have a cover, internal drainage system and a control system to limit VOC emissions from the unit unless the solvent being used has a low vapor pressure or the solvent is not heated above a specific temperature. A water blanket that lays on top of the solvent in the degreaser or a unit that is designed so that the height of the unit is much greater than the width of the opening, which will minimize VOC emissions, are considered acceptable methods of controlling VOC emissions.

6NYCRR 226 .4 (a)

This reference requires cold cleaning degreasers to have a system in place which allows the solvent on cleaned parts to drain for at least 15 seconds, or until dripping ceases, prior to removing the parts from the unit. This operating requirement will reduce the amount of VOCs that are carried out of the unit.



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6NYCRR 227 .2 (b) (1)

This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.1 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6NYCRR 227-1.2 (a) (2)

This rule limits particulate emissions to 0.20 pound per million Btu heat input from any stationary combustion installation with a maximum heat input capacity exceeding 50 million Btu per hour but no greater than 250 million Btu per hour using oil (other than distillate oil), coal tar, or any liquid fuel derived from coal.

6NYCRR 228 .7

Table 1 provides a list of surface coating processes and the corresponding allowable VOC content of the coatings used in each process.

6NYCRR 229 .3 (e)

This rule is only applicable to major sources of Volatile Organic Compounds. This section of the regulation specifies control requirements for Volatile Organic Liquid storage tanks. The Carbon Disulfide tank at 3

M is a Horizontal tank and uses a water blanket to in the vapor space as a control of emissions. This has been determined to be more effective than a floating roof.

6NYCRR 257-10

This regulation establishes an ambient air quality standard for Hydrogen Sulfide based on odor. 3M modeled emissions and has demonstrated that plant emissions do not cause a violation.

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Short Description</b>	<b>Regulation</b>
U-TANKS/CS20A	NSPS for volatile organic liquid storage vessels- applicability and designation of affected facilities	40CFR 60-Kb
Reason: The Carbon Disulfide Tank minimizes emissions by maintaining a layer of water in the head space of the storage tank. Carbon Disulfide is heavier than water and not readily miscible in water. 40 CFR 60 subpart Kb applicability is based on vapor pressure of the surface material in the tank which, in this case, is water. The USEPA has determined the water is in contact with the atmosphere and the vapor pressure is below the threshold and therefore the requirements of Kb are not applicable.		
U-TANKS/NAOH0/266/NAOH0	NSPS for volatile organic liquid storage vessels- applicability and designation of affected facilities	40CFR 60-Kb

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

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confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

### Compliance Certification

Summary of monitoring activities at 3M TONAWANDA:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
U-BOILS/-/279	intermittent emission testing	1-7
U-BOILS	work practice involving specific operations	1-6
U-BOILS/-/279	monitoring of process or control device parameters as surrogate	1-8
U-NCS01/NCS01/NCS/SCRUB	monitoring of process or control device parameters as surrogate	60
U-NCS01/NCS01/NCS/SCRUB	monitoring of process or control device parameters as surrogate	61
U-NCS01/NCS01/NCS/SCRUB	intermittent emission testing	62
FACILITY	record keeping/maintenance procedures	1-3
FACILITY	record keeping/maintenance procedures	1-4
FACILITY	monitoring of process or control device parameters as surrogate	4-11
FACILITY	continuous emission monitoring (cem)	4-12
FACILITY	monitoring of process or control device parameters as surrogate	4-13
FACILITY	monitoring of process or control device parameters as surrogate	4-14
FACILITY	record keeping/maintenance procedures	29
U-MAKOT	record keeping/maintenance procedures	44
U-NCS01	intermittent emission testing	2-6
U-SEPAR/SEPAR	monitoring of process or control device parameters as surrogate	1-10
U-SEPAR/SEPAR	intermittent emission testing	1-11
U-SEPAR/SEPAR	monitoring of process or control device parameters as surrogate	1-12
U-SEPAR	intermittent emission testing	4-7
U-SEPAR/SEPAR	monitoring of process or control device parameters as surrogate	4-9
U-NCS01/NCS01/NCS/ONSRU	continuous emission monitoring (cem)	2-12
U-NCS01/NCS01/NCS/BOIL4	monitoring of process or control device parameters as surrogate	58
U-NCS01/NCS01/NCS/BOIL4	monitoring of process or control device parameters as surrogate	59
U-MAKOT/-/OTH	record keeping/maintenance procedures	2-5
U-NCS01/NCS01/NCS/000C1	monitoring of process or control device parameters as surrogate	54
U-NCS01/NCS01/NCS/000C2	monitoring of process or control device parameters as surrogate	55
U-SEPAR/SEPAR	continuous emission monitoring (cem)	4-8
U-NCS01/NCS01	monitoring of process or control device parameters as surrogate	2-7
U-NCS01/NCS01	continuous emission monitoring (cem)	2-8
U-NCS01/NCS01/NCS/SCRUB	intermittent emission testing	63
U-THERM/E0000/254	work practice involving specific operations	68
U-THERM/E0000/254	work practice involving specific operations	69



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	operations	
U-PTSCL	record keeping/maintenance procedures	64
U-PTSCL	record keeping/maintenance procedures	65
U-THERM	intermittent emission testing	67
U-BOILS	intermittent emission testing	1-14
U-CONVT/-/277	monitoring of process or control device parameters as surrogate	2-4
U-TANKS/CS20A/266/CS200	record keeping/maintenance procedures	66
U-NCS01/NCS01	monitoring of process or control device parameters as surrogate	2-10

**Basis for Monitoring**

The permit requires monitoring of emission point SEPAR for Sulfur Dioxide (SO<sub>2</sub>) emissions, outlet Temperature and control efficiency. These items will insure compliance with the facility SO<sub>2</sub> and Volatile Organic Compound (VOC) facility "Caps". Monitoring conditions are as follows:

6NYCRR part 212.5(d) requires SO<sub>2</sub> from emission point SEPAR will be Continuously monitored and emissions added to determine compliance with the facility limit of 71.26 tons per year based on a 12 month rolling average. This limit was established during an expansion under a New Source Review identified as permit modification #1.

6NYCRR part 212.11(b)(1) requires monitoring temperature at the outlet of the Thermal Oxidizer and requires a stack test to determine the minimum temperature. The thermal oxidizer will destroy VOC's. The minimum temperature determined during the compliance test will be used as a surrogate monitoring parameter in determining compliance with the required destruction efficiency of the Thermal Oxidizer.