



**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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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.

**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 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 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, B1000, B3000, BKFWW, BKPBS, FN000, FS000, LNMEZ, LSMEZ, MC001, MC002, MMIX1, MMIX2, MRE03, MRE04, MRE05, MRE06, MRE15, MRE20, MRE23, MRE30, TRNOV

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

Process: MCO is located at Building 1-20 - Two pulp feed systems for viscose production. The pulp feed system will break up the pulp. The pulp will then be sprayed with water or a caustic solution and fed into one of four existing viscose shredders.

Process: OTH is located at MAIN, Building 1-23 - Sources in the sponge making process that do not vent to the main stack include:

1. Particulate from material handling operation for process materials used in sponge making located in Bldg. 1-21 and 1-41.
2. Uncaptured emissions from EC cooker, EC mixer, reclamation tank , and ML wash sources (i.e. main stack sources), located in bldg. 1-21 and 1-23.
3. Emissions from viscose handling, the conveying of unwashed sponge blocks, mother liquor collection and storage system, salt crystallizing and handling system, and washing of sponge blocks, located in bldg. 1-20, 1-21, 1-23.
4. Uncaptured emissions from lam line mixers and lam line cook tables located in bldg 1-04.

Emission unit UNCS01 - Sponge making sources associated with viscose production, material weight out and transfer, sponge mixing, sponge cooking, wash tables, continuous salt processing, and reclamation operation that vent to the main stack. It also includes by pass emissions from the mother liquor treatment operation, emission unit USEPAR.

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 NE 1-72 - Low carbon disulfide process sources that vent directly to emission point NCS01 associated with sponge manufacturing.

Process: SRU is located at Building NE 1-72 - Higher carbon disulfide concentration process sources that vent to carbon absorption control equipment and exhaust out NCS01 (main stack) associated with sponge manufacturing.

Process: WAO is located at Building NE 1-72 - 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 UTANKS - This emission unit includes the non-exempt storage tanks, exempt carbon disulfide storage tank, and the water blanket used in carbon disulfide tank secondary containment dike.

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

ACID3, BL004, CS20C, CS20D, NAOH7

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

Process: 266 is located at GROUND ELEVATION, Building TANKS - The NaOH7, ACID3, BLOO4, tanks each have one emission point associated with them, the CS203 tank has two. CS20C is the dike where displaced water is aerated to remove carbon disulfide. CS20D is the pressure relief vent line for the tank.

Emission unit USEPAR - The process technology converts contaminants in the salt reclamation process by oxidation to sulfate and carbon dioxide.



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 1-72 - The process technology converts contaminants in the waste liquor under pressure and temperature to sulfate and carbon dioxide.

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 a coater used to apply adhesive. The coater utilizes a heater to melt the adhesive.

Emission unit UBOILS - Two new boilers will be installed to supply steam for plant use and will replace Boilers identified in emission unit UOTHERM. The new boilers are rated for: 60.4 mmBTU/hr when burning No. 2 oil and 63.2 mmBTU/hr when burning natural gas.

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 1-72 - Emission Source BOI01 and BOI02, two boilers, rated at 63.2 mmbtu/hr each, when firing natural gas as primary fuel.

Process: 279 is located at Building 1-72 - Emission Source BOI01 and BOI02, 2 boilers rated at 60.4mmbtu/hr when firing on # 2 low sulfur oil as backup to natural gas use.

**Title V/Major Source Status**

3M TONAWANDA is subject to Title V requirements. This determination is based on the following information: 3M is major for VOC emissions and Hazardous Air Pollutants.

**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**

2821  
3089

**Description**

PLASTICS MATERIALS AND RESINS  
PLASTICS PRODUCTS, NEC

**SCC Codes**

SCC or Source Classification Code is a code developed and used" by the USEPA to categorizeprocesses which result in air emissions for the purpose of assessing emission factor information.Each SCC represents



## Permit Review Report

Permit ID: 9-1464-00164/00117

Renewal Number: 1

Modification Number: 2 10/22/2008

a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-03-005-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL Grades 1 and 2 Oil
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) HYDROCHLORIC ACID: BREATHING LOSS_** (USE 3-01-870-33)
3-02-032-01	FOOD AND AGRICULTURE FOOD AND AGRICULTURE - BAKERIES Bread Baking: Sponge-Dough Process
3-07-003-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - NEUTRAL SULFITE SEMICHEMICAL PULPING
4-02-013-10	OTHER NOT CLASSIFIED 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	1103.8	
000107-02-8	ACROLEIN	73.6	
000075-15-0	CARBON DISULFIDE	675800	
000630-08-0	CARBON MONOXIDE	66240	E
000463-58-1	CARBONYL SULFIDE	188480	Y
0NY100-00-0	HAP	32000	H
007783-06-4	HYDROGEN SULFIDE	pteyear	
007439-92-1	LEAD	pteyear	Y
0NY210-00-0	OXIDES OF NITROGEN	pteyear	F
0NY075-00-0	PARTICULATES	pteyear	C
0NY075-00-5	PM-10	pteyear	C



007446-09-5	SULFUR DIOXIDE	pteyear	
007664-93-9	SULFURIC ACID	pteyear	
0NY998-00-0	VOC	pteyear	H

**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



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 exclusive privilege.

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

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



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

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

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of



the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

**Item L: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

Any person who owns and/or operates stationary sources shall operate



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

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

**Regulatory Analysis**

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY			
	Powers and Duties of the		Department with respect to air pollution control
FACILITY	40CFR 52-A.21		
	Prevention of Significant		Deterioration
U-BOILS/-/279	40CFR 60-A.11(e)(1)		
	General provisions -		compliance with standards and maintenance requirements
U-BOILS	40CFR 60-Dc.42c(d)		
	Standard for Sulfur		Dioxide Firing Oil. (see narrative)
U-BOILS/-/279	40CFR 60-Dc.44c(h)		
	Alternative Compliance		and Performance Test Methods and Procedures for Sulfur Dioxide.
FACILITY	40CFR 63-UUUU.5505(a)		
	Cellulose Products		Manufacturing NESHAP - Emission Limits
U-TANKS	40CFR 63-UUUU.5505(a)		
	Cellulose Products		Manufacturing NESHAP - Emission Limits
U-NCS01	40CFR 63-UUUU.5505(b)		
	Cellulose Products		Manufacturing NESHAP - Operating Limits



U-SEPAR	40CFR 63-UUUU.5505 (b)	
Cellulose Products		Manufacturing NESHAP - Operating Limits
FACILITY	40CFR 63-UUUU.5515 (c)	
Cellulose Products		Manufacturing NESHAP - Startup, shutdown, malfunction plan
FACILITY	40CFR 63-UUUU.5545 (a)	
Cellulose Products		Manufacturing NESHAP - Site Specific Monitoring Plan
FACILITY	40CFR 63-UUUU.5580 (a)	
Cellulose Products		Manufacturing NESHAP - Reporting requirements
FACILITY	40CFR 68	
Chemical accident		prevention provisions
FACILITY	40CFR 82-F	
Protection of		Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	
Acceptable ambient air		quality.
FACILITY	6NYCRR 200.7	
FACILITY	6NYCRR 201-1.4	
Unavoidable noncompliance		and violations
FACILITY	6NYCRR 201-1.7	
FACILITY	6NYCRR 201-1.8	
Prohibition of		reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	
Exempt Activities - Proof		of eligibility
FACILITY	6NYCRR 201-3.3 (a)	
Trivial Activities -		proof of eligibility
FACILITY	6NYCRR 201-6	
Title V Permits and the		Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	
FACILITY	6NYCRR 201-6.5 (a) (7)	
FACILITY	6NYCRR 201-6.5 (a) (8)	



FACILITY	6NYCRR 201-6.5 (c)	
	Permit conditions for	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	
	Permit conditions for	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	
	Permit conditions for	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	
FACILITY	6NYCRR 201-6.5 (e)	
FACILITY	6NYCRR 201-6.5 (f) (6)	
FACILITY	6NYCRR 201-6.5 (g)	
FACILITY	6NYCRR 201-7	
	Federally Enforceable	Emissions Caps
FACILITY	6NYCRR 202-1.1	
FACILITY	6NYCRR 202-2.1	
	Emission Statements -	Applicability
FACILITY	6NYCRR 202-2.5	
	Emission Statements -	record keeping requirements.
FACILITY	6NYCRR 211.2	
	General Prohibitions -	air pollution prohibited.
FACILITY	6NYCRR 211.3	
	General Prohibitions -	visible emissions limited
U-MAKOT	6NYCRR 212.10	
	NOx and VOC RACT required	at major facilities
U-NCS01/-/NCS	6NYCRR 212.10	
	NOx and VOC RACT required	at major facilities
U-NCS01/-/SRU	6NYCRR 212.10	
	NOx and VOC RACT required	at major facilities
U-SEPAR/SEPAR	6NYCRR 212.10 (c) (4) (i)	
	NOx and VOC RACT required	at major facilities



U-NCS01/NCS01/NCS/00120	6NYCRR 212.10 (c) (4) (iii)		
General Process Emission			Sources - NOx and VOC RACT required at major facilities
U-NCS01/-/SRU	6NYCRR 212.11 (b) (3)		
U-MAKOT/-/MCO	6NYCRR 212.4 (c)		
General Process Emission			Sources - emissions from new processes and/or modifications
U-NCS01	6NYCRR 212.4 (c)		
General Process Emission			Sources - emissions from new processes and/or modifications
U-SEPAR/SEPAR	6NYCRR 212.5 (d)		
Applicable emission			standards
FACILITY	6NYCRR 212.6 (a)		
General Process Emission			Sources - opacity of emissions limited
U-NCS01/-/SRU	6NYCRR 212.9		
U-SEPAR	6NYCRR 212.9 (b)		
General Process Emission			Sources - tables
FACILITY	6NYCRR 215		
U-BOILS	6NYCRR 227-1.2 (a) (2)		
Particulate Emissions			Firing Liquid Fuels Excluding Distillate Oil. (see narrative)
FACILITY	6NYCRR 231-2	facondition	New Source Review in Nonattainment Areas and Ozone Transport Region

**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)

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 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 201-6.5(g)

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

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-2

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

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of



appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

### **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 is a requirement for monitoring opacity from the boilers. Opacity limitation with periodic monitoring is detailed in the condition.

#### 40CFR 60-Dc.42c (d)

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

#### 40CFR 60-Dc.44c (h)

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

#### 40CFR 63-UUUU.5505 (a)

40 cfr 5505a specifies the emission limit and work practice requirements for this facility. Applicable is the 75% overall reduction of Carbon Disulfide emissions, nitrogen blanket on the Carbon disulfide storage tank, and the monitoring of the by pass valves. In the monitoring detailed in the permit under this rule EPA has allowed for alternate method of monitoring the control equipment bypass. The rule required a flow indicator or lock and key mechanism. This facility has been approved to install a valve position indicator and electronic recorder of position. This type of bypass monitoring is cited as an acceptable means of determining compliance in other NESHAP regulations.

#### 40CFR 63-UUUU.5505 (b)

This section of the NESHAP regulation applicable to this facility requires monitoring of carbon regeneration rates to insure operation is as demonstrated during the compliance test. The facility operates a continuous emission rate monitoring system on the inlet and outlet of the carbon absorber. the system generates ppm , pounds per hour and ton per year emission rates for carbon disulfide, the pollutant of concern. This is considered better and more accurate in determining compliance with the requirements of the NESHAP for cellulose products manufacturing.

#### 40CFR 63-UUUU.5515 (c)

This section of the regulation requires the facility to develop a written startup, shutdown and malfunction plan.

#### 40CFR 63-UUUU.5545 (a)

This section of the rule contains details for the quality assurance and quality control of the continuous emission monitors (CEM's) and for continuous parameter monitoring systems, (CPMS) at the facility. 3M maintains a CEM on emission point NCS01 for carbon disulfide, and hydrogen sulfide. Emission unit U-SEPAR uses a



thermal Oxidizer for control and the temperature limit is considered a CPMS. Also a flow indicator at emission unit U-SEPAR, emission point SEPAR, and Emission Unit U-NCS01, emission point NCS01, utilize an EPA alternative method of bypass line flow indication. This is listed under condition for 40 cfr 63.5505(a). The approved method is a flow control position indicator.

40CFR 63-UUUU.5580 (a)

This condition specifies the records, reports and general provisions that apply. They are listed in Tables 8, 9, and 10 of the regulation.

6NYCRR 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6NYCRR 212 .10

212.10 is the Reasonable Available Control Technology requirements (RACT) for VOC and NOx emissions from general process sources. This condition requires a RACT review prior to exceeding the 3 pound per hour emission rate. RACT is not required by rule for emissions less than 3 pounds per hour.

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

VOC removal efficiency greater than 81% is considered RACT.

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

This rule allows those sources which cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the department.

6NYCRR 212 .11 (b) (3)

212.11(b)(3) details the quality assurance and quality control requirements for maintaining the carbon disulfide continuous emission rate monitoring system. on emission point NCS01.

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 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.



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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 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

**Non Applicability Analysis**

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

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>
U-TANKS/CS20D	40CFR 60-Kb	NSPS for volatile organic liquid storage vessels- applicability and designation of affected facilities

Reason: This tank is designed to operate in excess of 204.9 kPa and will not have emissions to the atmosphere. The requirements 40 cfr 60, subpart Kb, do not apply per the exemption listed in 40 cfr 60.110b(d) (2).

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state 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:

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
U-BOILS/-/279	39	intermittent emission testing
U-BOILS	38	work practice involving specific operations
U-BOILS/-/279	40	monitoring of process or control device parameters as surrogate
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	record keeping/maintenance procedures
U-NCS01	43	record keeping/maintenance procedures
U-SEPAR	49	monitoring of process or control device parameters as surrogate
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures



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FACILITY	6	record keeping/maintenance procedures
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
U-MAKOT	41	record keeping/maintenance procedures
U-NCS01/-/NCS	44	monitoring of process or control device parameters as surrogate
U-NCS01/-/SRU	46	continuous emission monitoring (cem)
U-SEPAR/SEPAR	51	monitoring of process or control device parameters as surrogate
U-NCS01/NCS01/NCS/00120	1-1	intermittent emission testing
U-NCS01/-/SRU	47	continuous emission monitoring (cem)
U-MAKOT/-/MCO	2-1	monitoring of process or control device parameters as surrogate
U-NCS01	42	monitoring of process or control device parameters as surrogate
U-SEPAR/SEPAR	50	continuous emission monitoring (cem)
FACILITY	30	record keeping/maintenance procedures
U-NCS01/-/SRU	45	continuous emission monitoring (cem)
U-SEPAR	48	monitoring of process or control device parameters as surrogate
U-BOILS	56	intermittent emission testing

**Basis for Monitoring**

Part of the pulp feed system is a mist coater to adjust moisture content. This also prevents excessive particulate emissions out emission point MC001 and MC002. A stack test will set appropriate monitoring of volumetric flow rate to the mist coater.

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