



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

Permit ID: 9-5632-00007/00039

Renewal Number: 2

Modification Number: 1 09/09/2015

Facility Identification Data

Name: MORTON SALT INC
Address: 45 RIBAUD AVE E
SILVER SPRINGS, NY 14550

Owner/Firm

Name: MORTON SALT INC
Address: 45 RIBAUD AVE
SILVER SPRINGS, NY 14550, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Division of Air Resources:
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Air Permitting Facility Owner Contact:
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PO BOX 342
SILVER SPRINGS, NY 14550-0342
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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

This project is the conversion of the main power plant from coal to natural gas. The existing 138 mmBtu/hr coal fired steam boiler and associated coal-related processes will be removed. The operation of an existing 92.5 mmBtu/hr natural gas fired boiler will be discontinued. These two boilers will be replaced



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by a single 148 mmBtu/hr natural gas steam boiler and eight (8) individual, less than 5 mmBtu/hr, natural gas direct fired building heaters.

Attainment Status

MORTON SALT INC is located in the town of GAINESVILLE in the county of WYOMING. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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

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

Facility Description:

The facility produces, packages and ships evaporated sodium chloride salt products. The salt brine is obtained by hydraulic mining and is evaporated to produce a slurry which is dewatered and dried. Evaporation is accomplished using steam produced by a natural-gas fired boiler.

Permit Structure and Description of Operations

The Title V permit for MORTON SALT INC 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



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that is not included in the above categories.

MORTON SALT INC is defined by the following emission unit(s):

Emission unit MBC001 - Emission Unit M-BC001 includes a pulverized coal dry bottom boiler producing steam for brine evaporation, salt drying, building heat and one steam driven electrical generator generating electricity for internal use only. The boiler has an electrostatic precipitator to control particulate emissions. The emission points include a brick chimney (EP0001) and a fly ash accumulation silo (EP00031).

The coal boiler and associated source equipment are planned for removal upon installation of the new natural gas boiler. The permanent shutdown of this source must occur no later than January 30, 2016.

Emission unit MBC001 is associated with the following emission points (EP):
00001, 00031

Process: 001 is located at Building 1 - Process 001 includes the combustion of bituminous coal in a pulverized dry bottom boiler for steam generation. This process will be discontinued upon removal of the coal boiler.

Process: 002 is located at 1, Building 1 - Process 002 includes the natural gas ignitors on the coal boiler. This process will be discontinued upon removal of the coal boiler.

Process: 004 is located at Building 1 - Process 004 includes the pneumatic conveyance of flyash from the coal fired boiler and electrostatic precipitator to a storage silo through two cyclones in series and then through a Mikropul baghouse. The baghouse exhausts through the steam injector from the boiler to EP00031. The storage silo has a filtered vent. This process will be discontinued upon shutdown of the coal boiler.

Emission unit MBG003 - Emission Unit M-BG003 includes a new natural gas 148 MMBtu/hr steam boiler and eight (8) small direct fired building heaters.

The installation of this emission unit is expected to begin in September, 2015. This emission unit replaces the existing 138 MMBtu/hr coal boiler and the existing 92.5 MMBtu/hr natural gas boiler.

Emission unit MBG003 is associated with the following emission points (EP):
00028

Process: BLR is located at Building 1 - Process BLR includes the new 148 MMBtu/hr natural gas fired boiler.

Process: HTR Process HTR includes eight (8) new direct fired building heaters.

Emission unit MML005 - Emission unit M-ML005 includes the bulk storage, screening, blocking, packaging, and bulk truck loading of salt (NaCl) products.



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Emission unit MML005 is associated with the following emission points (EP):
00002, 00008, 00009

Process: 008 is located at Building 36 - Process 008 is the collection of salt (NaCl) dust from the salt handling equipment including screw conveyors, belt conveyors, bucket elevators, screeners, block press, and packaging equipment. The salt is removed from the air stream in a dry bag house. The salt is collected, dissolved, and returned to the manufacturing process. The clean air is exhausted to the atmosphere.

Emission unit MPT003 - Emission Unit M-PT003 includes the production and packaging of briquetted salt (NaCl) as a water conditioning recharge product. The system includes briquetting presses, screw conveyors, bucket elevators, screeners, packaging equipment, and dust collector.

Emission unit MPT003 is associated with the following emission points (EP):
00026

Process: 006 is located at 3RD FLOOR, Building 33 - Process 006 is the collection of salt (NaCl) dust collected from pellet production equipment including: briquetters, screw conveyors, screeners, bucket elevators, bins, and packaging equipment. The salt is removed from the air stream by a wet venturi scrubber. The effluent is recycled in the process system. Clean air is exhausted to the atmosphere.

Emission unit MPH006 - Emission Unit M-PH006 includes wet dust collectors used in capturing salt (NaCl) dust from screw conveyors, belt conveyors, bucket elevators, screeners, silos, and rotary conditioner.

Emission unit MPH006 is associated with the following emission points (EP):
00003, 00005, 00010, 00014

Process: 010 is located at TOP OF SILO/HALF FLO, Building 32 - Process 010 is the collection of salt (NaCl) dust from screw conveyors, scalping screens, belt conveyors, bucket elevators, storage silos, and rotary conditioner (unfired rotary kiln, ambient air). The effluent is recycled in the process system. The clean air is exhausted to the atmosphere.

Emission unit MBG002 - Emission Unit M-BG002 includes a natural gas fired boiler that produces steam for building heat, salt production and drying. As per 6NYCRR Part 227-2, the 92.5 mm Btu/hr boiler is classified as a mid-size boiler.

The 92.5 MMBtu/hr Cleaver Brooks Model DL-94S natural gas boiler was permanently shut down prior to July 1, 2015.

Emission unit MBR004 - Emission Unit M-BR004 includes bulk loading of salt (NaCl) into rail cars.

Emission unit MBR004 is associated with the following emission points (EP):



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00025

dust from bulk railcar loading. The salt is removed from the air stream by a wet venturi scrubber. The effluent is recycled in the process system. Clean air is exhausted to the atmosphere.

Title V/Major Source Status

MORTON SALT INC is subject to Title V requirements. This determination is based on the following information:

Morton Salt is currently a major source of NOx, SO2 and HCl. Upon completion of this modification and removal of the existing coal and gas boiler, Morton Salt will not be major for any contaminants.

Program Applicability

The following chart summarizes the applicability of MORTON SALT INC with regards to the principal air pollution regulatory programs:

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

NOTES:

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

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

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



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MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to

be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

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

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

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

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

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

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis

of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

2899

CHEMICAL PREPARATIONS, NEC

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SCC Codes

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

SCC Code	Description
1-01-002-02	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - BITUMINOUS COAL PULVERIZED COAL: DRY BOTTOM (BITUMINOUS COAL)
1-02-002-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - SUBBITUMINOUS COAL Pulverized Coal: Dry Bottom
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-03-006-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS Over 100 MMBtu/Hr
1-05-001-06	EXTERNAL COMBUSTION BOILERS - SPACE HEATERS INDUSTRIAL SPACE HEATER Natural Gas
3-05-021-01	MINERAL PRODUCTS MINERAL PRODUCTS - SALT MINING General
3-05-021-03	MINERAL PRODUCTS MINERAL PRODUCTS - SALT MINING Filtration: Vacuum Filter

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE 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



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specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS		>= 250 tpy but < 75,000 tpy
000630-08-0	CARBON MONOXIDE		>= 50 tpy but < 100 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 40 tpy but < 50 tpy
0NY075-00-0	PARTICULATES		>= 50 tpy but < 100 tpy
0NY075-02-5	PM 2.5		>= 40 tpy but < 50 tpy
0NY075-00-5	PM-10		>= 50 tpy but < 100 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
0NY100-00-0	TOTAL HAP		> 0 but < 2.5 tpy
0NY998-00-0	VOC		>= 2.5 tpy but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
 - (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any

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applicable requirement.

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

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

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based 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 201-6.4(a)(2)

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

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)

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

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)

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

Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)

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

Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)

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



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Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- 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 201-6.4(i)

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

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

Proceedings to reopen and issue Title V facility permits shall follow the same



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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	Regulation	Condition	Short Description
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Facility/EU/EP/Process/ES

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FACILITY	ECL		
	ECL 19-0301	41	
M-BG003/-/BLR	40CFR 60-Db.44b	1	-31
M-BG003/-/BLR	40CFR 60-Db.46b	1	-32
M-BG003/-/BLR	40CFR 60-Db.48b	1	-33
M-BG003/-/BLR	40CFR 60-Db.49b	1	-34
M-BG003/-/BLR	40CFR 60-Db.49b (g)	1	-35
M-BG003/-/BLR	40CFR 60-Db.49b (h)	1	-36
M-BG003/-/BLR	40CFR 60-Db.49b (i)	1	-37
M-BG003/-/BLR	40CFR 60-Db.49b (o)	1	-38
M-BG003/-/BLR	40CFR 60-Db.49b (v)	1	-39
M-BG003/-/BLR	40CFR 60-Db.49b (w)	1	-40
M-BC001/-/001	40CFR 63-DDDDD	1	-19
M-BG003/-/BLR	40CFR 63-DDDDD.7500	1	-41
M-BG003/-/BLR	40CFR 63-DDDDD.7515 (d)	1	-42
M-BG003/-/BLR	40CFR 63-DDDDD.7540 (a)	1	-43
M-BG003/-/BLR	40CFR 63-DDDDD.7545 (c)	1	-44
M-BG003/-/BLR	40CFR 63-	1	-45

Powers and Duties of the Department with respect to air pollution control Standard for Nitrogen Oxides Firing Natural Gas and Distillate Oil. (see narrative) Compliance and Performance Test Methods and Procedures for Particulate Matter and Nitrogen Oxides. Emissions Monitoring for Particulate Matter and Nitrogen Oxides. Reporting and Recordkeeping Requirements. Reporting and Recordkeeping - Electronic report submittal Reporting and Recordkeeping - Reporting period Boilers and Process Heaters Major Source NESHAP rule ICI Boiler Major Source NESHAP - Emission and Operating Limits and Work Practice Standards ICI Boiler Major Source NESHAP - Boiler Tune-ups ICI Boiler Major Source NESHAP - Continuous Compliance ICI Boiler Major Source NESHAP - New Source Notification ICI Boiler Major

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	DDDDD.7550 (c)			Source NESHAP -
FACILITY	40CFR 64	27		Compliance Reports
M-BC001/-/001	40CFR 64	1 -20		COMPLIANCE ASSURANCE
FACILITY	40CFR 68	19		MONITORING
FACILITY	40CFR 82-F	20		COMPLIANCE ASSURANCE
				MONITORING
				Chemical accident
				prevention provisions
				Protection of
				Stratospheric Ozone -
				recycling and
				emissions reduction
FACILITY	6NYCRR 200.6	1		Acceptable ambient
FACILITY	6NYCRR 200.7	9		air quality.
FACILITY	6NYCRR 201-1.4	1 -46		Maintenance of
				equipment.
				Unavoidable
				noncompliance and
				violations
FACILITY	6NYCRR 201-1.7	1 -6		Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11		Prohibition of
				reintroduction of
				collected
				contaminants to the
				air
FACILITY	6NYCRR 201-3.2 (a)	1 -7		Exempt Activities -
FACILITY	6NYCRR 201-3.3 (a)	1 -8		Proof of eligibility
FACILITY	6NYCRR 201-6	21, 28, 29		Trivial Activities -
				proof of eligibility
				Title V Permits and
				the Associated Permit
				Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	1 -9		General Conditions -
				Requirement to
				Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	1 -1		General Conditions -
FACILITY	6NYCRR 201-6.4 (a) (8)	1 -10		Fees
FACILITY	6NYCRR 201-6.4 (a) (8)	1 -10		General Conditions -
FACILITY	6NYCRR 201-6.4 (c)	1 -2		Right to Inspect
				Recordkeeping and
				Reporting of
FACILITY	6NYCRR 201-6.4 (c) (2)	1 -3		Compliance Monitoring
				Records of
				Monitoring, Sampling
				and Measurement
FACILITY	6NYCRR 201-	1 -4		Reporting
	6.4 (c) (3) (ii)			Requirements -
				Deviations and
				Noncompliance
FACILITY	6NYCRR 201-6.4 (d) (4)	1 -12		Compliance Schedules
FACILITY	6NYCRR 201-6.4 (e)	1 -5		- Progress Reports
FACILITY	6NYCRR 201-6.4 (f) (6)	1 -11		Compliance
FACILITY	6NYCRR 202-1.1	18		Certification
				Off Permit Changes
FACILITY	6NYCRR 202-2.1	6		Required emissions
				tests.
FACILITY	6NYCRR 202-2.5	7		Emission Statements -
				Applicability
				Emission Statements -
				record keeping
				requirements.
FACILITY	6NYCRR 211.1	24		General Prohibitions
				- air pollution
				prohibited



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FACILITY	6NYCRR 212-1.6 (a)	1	-13	Limiting of Opacity Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 212-2.4 (b)	1	-14	
FACILITY	6NYCRR 215.2	8		Open Fires - Prohibitions
M-BC001/-/001	6NYCRR 225-1.2 (c)	1	-17	Sulfur-in-Fuel Limitations
M-BG003/-/BLR	6NYCRR 227-1.3	1	-28	Smoke Emission Limitations.
M-BC001/-/001	6NYCRR 227-1.3 (a)	1	-18	Smoke Emission Limitations.
M-BG003/-/BLR	6NYCRR 227- 2.4 (a) (1) (ii)	1	-29	2010 NOx RACT presumptive limits.
M-BC001	6NYCRR 227-2.5	1	-15	Compliance options.
M-BG002	6NYCRR 227-2.5 (d)	1	-22	Shutdown of an emission source.
M-BG003/-/BLR	6NYCRR 227-2.6 (b)	1	-30	CEMS requirements
M-BC001	6NYCRR 231-10	1	-16	Emission Reduction Credits (ERCs)
M-BG002	6NYCRR 231-10	1	-23	Emission Reduction Credits (ERCs)
M-BG003	6NYCRR 231-11.1	1	-24, 1 -25, 1 - 26	Permit requirements for new major facilities, NSR major mods, and netting
M-BG003	6NYCRR 231-12	1	-27	Ambient Air Quality Impact Analysis

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

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6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

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

6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

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



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6 NYCRR 201-6.4 (c) (2)

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

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

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

6 NYCRR 201-6.4 (d) (5)

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

6 NYCRR 201-6.4 (e)

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

6 NYCRR 201-6.4 (f) (6)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F



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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, MORTON SALT INC has been determined to be subject to the following regulations:

40 CFR 60.44b

These standards apply to all boilers firing natural gas and/or distillate oil except as provided in 40 CFR 60.44b(a)(4) Duct Burners Used in a Combined Cycle System.

40 CFR 60.46b

This section sets the compliance and performance test methods and procedures for emissions of particulate matter and oxides of nitrogen.

40 CFR 60.48b

40 CFR 60.49b

This rule specifies the reporting and recordkeeping requirements for affected steam generating units.

40 CFR 60.49b (g)

This subdivision requires reporting and recordkeeping for affected steam generating units - specific oxides of nitrogen requirements.

40 CFR 60.49b (h)

This subdivision specifies that the facility must submit excess emission reports.

40 CFR 60.49b (i)

This subdivision specifies that the facility submit reports on oxides of nitrogen emissions in accordance with the required recordkeeping provisions of 40 CFR 60.49b(g).

40 CFR 60.49b (o)

40 CFR 60.49b (v)



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This regulation allows affected facilities to submit NO_x and/or SO₂ quarterly reports in an electronic format.

40 CFR 60.49b (w)

This regulation specifies that the reporting period for affected facilities is six months.

40 CFR 63.7500

40 CFR 63.7515 (d)

This regulation requires facilities with industrial, commercial or institutional boilers to tune-up their boilers on an annual, biennial, or every five years basis.

40 CFR 63.7540 (a)

This condition states how to demonstrate continuous compliance with emission limits, work practice standards, and operating limits.

40 CFR 63.7545 (c)

This condition states when an initial notification must be submitted for new and reconstructed sources

40 CFR 63.7550 (c)

This condition states the requirements for the compliance report

40 CFR Part 63, Subpart DDDDD

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

40 CFR Part 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device



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emissions equal to or greater than a major source threshold.

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

6 NYCRR 211.1

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

6 NYCRR 212-1.6 (a)

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except for the emission of uncombined water.

6 NYCRR 212-2.4 (b)

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 225-1.2 (c)

Sulfur-in-fuel limitations for solid fuel fired facilities on or after July 1, 2014.

6 NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 227-2.4 (a) (1) (ii)

Future NO_x RACT presumptive limits effective 7/1/14.



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6 NYCRR 227-2.5

Compliance options for emission sources subject to NO_x RACT that are not presumptive emission limits.

6 NYCRR 227-2.5 (d)

Shutdown of an emission source NO_x RACT compliance option.

6 NYCRR 227-2.6 (b)

Any owner or operator of a combustion source subject to reasonably available control technology (RACT) requirements, under this subdivision, for NO_x and either is required or opts to employ a continuous emissions monitoring system (CEMS) must:

- 1) Submit a CEMS monitoring plan for approval by the Department,
- 2) Submit a CEMS certification protocol,
- 3) Meet CEMS monitoring requirements as detailed in this paragraph of this subdivision, and
- 4) Meet CEMS recordkeeping and reporting requirements as detailed in this paragraph of this subdivision.

6 NYCRR 231-11.1

This section contains the permit requirements for new major facilities, NSR major modifications, and netting for this Part.

6 NYCRR Subpart 231-10

This subpart outlines the procedures used to create and use emission reduction credits (ERCs).

6 NYCRR Subpart 231-12

This Subpart establishes the requirements for conducting an ambient air quality impact analysis.

Compliance Certification



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Summary of monitoring activities at MORTON SALT INC:

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

M-BG003/-/BLR	1-31	continuous emission monitoring (cem)
M-BG003/-/BLR	1-32	record keeping/maintenance procedures
M-BG003/-/BLR	1-33	record keeping/maintenance procedures
M-BG003/-/BLR	1-34	record keeping/maintenance procedures
M-BG003/-/BLR	1-35	record keeping/maintenance procedures
M-BG003/-/BLR	1-36	record keeping/maintenance procedures
M-BG003/-/BLR	1-37	record keeping/maintenance procedures
M-BC001/-/001	1-19	record keeping/maintenance procedures
M-BG003/-/BLR	1-41	record keeping/maintenance procedures
M-BG003/-/BLR	1-42	record keeping/maintenance procedures
M-BG003/-/BLR	1-43	record keeping/maintenance procedures
M-BG003/-/BLR	1-45	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
M-BC001/-/001	1-20	record keeping/maintenance procedures
FACILITY	1-4	record keeping/maintenance procedures
FACILITY	1-5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	1-13	monitoring of process or control device parameters as surrogate
FACILITY	1-14	monitoring of process or control device parameters as surrogate
M-BC001/-/001	1-17	monitoring of process or control device parameters as surrogate
M-BG003/-/BLR	1-28	record keeping/maintenance procedures
M-BC001/-/001	1-18	monitoring of process or control device parameters as surrogate
M-BG003/-/BLR	1-29	continuous emission monitoring (cem)
M-BC001	1-15	monitoring of process or control device parameters as surrogate
M-BG002	1-22	record keeping/maintenance procedures
M-BG003/-/BLR	1-30	continuous emission monitoring (cem)
M-BC001	1-16	monitoring of process or control device parameters as surrogate
M-BG002	1-23	monitoring of process or control device parameters as surrogate
M-BG003	1-24	record keeping/maintenance procedures
M-BG003	1-25	monitoring of process or control device parameters as surrogate
M-BG003	1-26	monitoring of process or control device parameters as surrogate
M-BG003	1-27	record keeping/maintenance procedures

Basis for Monitoring

(1) Morton Salt, Inc. produces, packages, and ships evaporated sodium chloride salt products from the facility located at 45 Ribaud Avenue, Silver Springs, New York.

(2) The current permit modification includes conversion of the main power plant from combusting coal to natural gas. A new natural gas 148 MMBtu/hr steam boiler and eight (8) small direct fired building heaters will replace an existing 138 MMBtu/hr coal boiler and an existing 92.5 MMBtu/hr natural gas boiler.



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(3) A netting analysis was completed to avoid a New Source Review major modification. Nitrogen oxide (NO_x) is the only contaminant exceeding the significant project threshold since the project potential to emit (PTE) of 47.2 tons per year (tpy) NO_x is greater than the significant project threshold of 40 tpy.

(4) Emission Reduction Credits (ERCs) created by the shutdown of the two boilers include 111.9 tpy NO_x for the coal boiler and 0.4 tpy NO_x from the gas boiler. The total amount of ERCs created is 112.3 tpy NO_x.

(5) Morton Salt used 7.5 tpy NO_x ERCs to reduce the project PTE below the significant net emission increase of 40 tpy NO_x. The resulting total quantity of ERCs remaining after the netting analysis is 104.8 tpy NO_x.

(6) An air quality impact analysis was completed for this project. The purpose of the analysis was to determine the potential impact of the new project relative to the 1-hour nitrogen dioxide (NO₂) National Ambient Air Quality Standard (NAAQS) and annual PSD increment consumption for NO₂. Maximum annual NO₂ impacts fell well below the significance level of 1 ug/m³. Cumulative modeling was required for the 1-hour averaging period to incorporate impacts from nearby facilities. The maximum impact of 33.7 ug/m³ fell well below the NAAQS of 188 ug/m³, even after adding the conservative background value from Amherst, NY of 100.2 ug/m³.

(7) The new large boiler will comply with the relevant presumptive RACT emission limit of 0.06 pounds NO_x per million Btu burning only natural gas. The NO_x limit will be achieved by the use of low NO_x burners, flue gas recirculation and an oxygen trim system.

(8) The new large boiler will comply with 40 CFR 60 Subpart Db—Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. Morton Salt will install, calibrate, maintain, and operate a continuous emission monitoring system (CEMS) for measuring NO_x and O₂ (or CO₂) emissions discharged to the atmosphere.

(9) The new large boiler will comply with 40 CFR 63 Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. For a new affected source, the first 5-year tune-up must be no later than 61 months after the initial startup of the new boiler. Each subsequent 5-year tune-up must be conducted no more than 61 months after the previous tune-up.

(10) A case-by-case NO_x RACT proposal for the existing 138 MMBtu/hr coal boiler, dated February 28, 2013, indicated the NO_x control technologies are not technically or economically feasible due to the small furnace dimensions and flue gas exit temperature.

(11) On April 1, 2013, the amendments to 40 CFR 63 subpart DDDDD became effective. Morton Salt re-evaluated the compliance options for the existing boilers and determined the sources would be shut down to comply with NO_x RACT and 40 CFR 63 subpart DDDDD.

(12) Morton Salt is unable to meet the NO_x RACT compliance date of July 1, 2015 for the existing coal boiler. As required by Consent Order R9-20150615-38, between July 1, 2015 and



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January 30, 2016, the existing coal boiler must not exceed an emission rate of 0.5 lbs NO_x/MMBtu.

(13) No later than January 30, 2016, the existing large 138 MMBtu/hr Riley Stoker Corp Class BBY30WW coal fired boiler must be permanently shut down.

(14) Morton Salt has committed to shutting down the coal boiler before the compliance date of 40 CFR 63 Subpart DDDDD (5D). As such, the coal boiler will not be subject to the requirements of the regulation. Upon shutdown of the coal boiler, the facility will be a minor source of hazardous air pollutant emissions.

(15) The existing mid-size 92.5 MMBtu/hr Cleaver Brooks Model DL-94S natural gas boiler must be shut down prior to July 1, 2015; thus, in compliance with NO_x RACT and 40 CFR 63 Subpart DDDDD.