

**Division of Air Resources
Permit Review Report**

Permit ID: 4-0124-00001/00112

Renewal Number: 1

Modification Number: 21 10/13/2020

Facility Identification Data

Name: RAVENA CEMENT PLANT

Address: 1916 US RTE 9W

RAVENA, NY 12143-0003

Owner/Firm

Name: HOLCIM (US) INC

Address: 8700 W Bryn Mawr Ave Ste 300

Chicago, IL 60631, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: ANGELIKA R STEWART

Address: NYSDEC - REGION 4

1130 N WESTCOTT RD

SCHENECTADY, NY 12306

Phone:5183572069

Division of Air Resources:

Name: GARY MCPHERSON

Address: NYSDEC - REGION 4

1130 N WESTCOTT RD

SCHENECTADY, NY 12306-2014

Phone:5183572278

Air Permitting Contact:

Name: KATHERINE KESLICK

Address: LAFARGE BUILDING MATERIALS INC

1916 US RTE 9W PO BOX 3

RAVENA, NY 12143

Phone:5187565026

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

RAVENA CEMENT PLANT is located in the town of COEYMANS in the county of ALBANY.

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.)

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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.

Permit Structure and Description of Operations

The Title V permit for RAVENA CEMENT PLANT

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

RAVENA CEMENT PLANT is defined by the following emission unit(s):

Emission unit 020000 - THIS UNIT CONSISTS OF EXISTING SOURCES INVOLVED IN THE HANDLING OF THE RAW MATERIALS AND SOLID FUELS AT THE FACILITY.

Emission unit 020000 is associated with the following emission points (EP):

34301, 46012, 46013, 46014, 46015, 46017

Process: FAX is located at ROOF, Building FLYASHSILO - TRANSFER OF FLY ASH TO FLY ASH STORAGE SILO FROM TRUCKS AND FROM SILO TO FLY ASH ALLEVIATOR.

Process: LCR is located at GROUND, Building 2NDCRUSHER -

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Process: LMS is located at Building MILLBLDING - STORAGE AND TRANSFER OF LIMESTONE FROM THE SILOS TO THE MILLING MACHINES.

Process: MAS is located at Building MASONSILO - TRANSFER OF MATERIAL INTO AND OUT OF THE MASONRY FRINGE SILO. THIS PROCESS IS VENTED BY A DUST COLLECTOR LOCATED ON TOP OF THE MASONRY FRINGE SILO.

Process: RX1 is located at GROUND, Building 2NDCRUSHER - TRANSFER OF RAW MATERIALS THROUGH THE SECONDARY CRUSHER AND ONTO CONVEYOR #7. CALCIUM SOURCES (LIMESTONE), SOLID FUELS, AND IRON SOURCES ARE TRANSFERRED THROUGH THE SECONDARY CRUSHER AND ONLY CONVEYOR #7.

Process: RX2 is located at 6, Building MILLBLDING - TRANSFER OF RAW MATERIALS (CALCIUM SOURCES, SOLID FUEL, AND IRON SOURCES) FROM CONVEYOR 7 DISCHARGE CHUTE TO THE SHUTTLE BELT LOAD CHUTE.

Emission unit 090000 - EMISSION UNIT 090000 CONTAINS EXISTING EMISSION SOURCES INVOLVED IN THE FACILITY'S QUARRY OPERATIONS. THIS INCLUDES THE PRIMARY CRUSHER LOCATED IN THE PRIMARY CRUSHER BUILDING.

Emission unit 090000 is associated with the following emission points (EP):
32002

Process: PCR is located at GROUND, Building PRCRUSHER -

Process: PCS is located at Building PRCRUSHER -

Emission unit 053000 - THIS UNIT CONSISTS OF EXISTING AND MODIFIED EQUIPMENT ASSOCIATED WITH FINISH MILL NO. 3. THIS INCLUDES FEED BELTS TO THE CEMENT MILL, THE MILL, CONVEYING EQUIPMENT AFTER THE MILL (BUCKET ELEVATOR AND AIR SLIDES), THE MILL 3 SEPARATOR AND CEMENT COOLER. COMPONENTS OF THE CEMENT MILL 1 SYSTEM ARE CONTAINED IN THE MILL BUILDING.

Emission unit 053000 is associated with the following emission points (EP):
43603, 43604, 52301, 53301, 53302

Process: CM3 is located at GROUNDN, Building MILLBLDING -

Process: FM3 is located at Building MILLBLDG -

Process: FX3 is located at ALL, Building MILLBLDING -

Emission unit 055000 - THIS UNIT CONSISTS OF ALL EQUIPMENT ASSOCIATED WITH NEW FINISH MILL NO. 5 INCLUDING THE ADDITIVE STORAGE AND MILL FEED SYSTEMS.

Emission unit 055000 is associated with the following emission points (EP):

40301, 40302, 40303, 45301, 45302, 45303, 45304, 45606, 46301, 46302, 46303, 46304, 46501

Process: FAD is located at Building MILLBLDG -

Process: FBF is located at Building FMBINS -

Process: FBH is located at Building FM5BH -

Process: FM5 is located at Building FM5 -

Emission unit 054000 - EMISSION UNIT 054000 CONSISTS OF THE CEMENT MILL 4 SYSTEM.

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THIS INCLUDES FEED BELTS TO THE CEMENT MILL, THE MILL, CONVEYING EQUIPMENT AFTER THE MILL (BUCKET ELEVATOR AND AIR SLIDES), THE TWO MILL 4 SEPARATORS AND CEMENT COOLER. ALL OF THE COMPONENTS OF THE CEMENT MILL 4 SYSTEM ARE CONTAINED IN THE MILL BUILDING.

Emission unit 054000 is associated with the following emission points (EP):

52401, 53401, 53402, 53403

Process: CM4 is located at GROUND, Building MILLBLDING -

Process: FX4 is located at ALL, Building MILLBLDING -

Process: FX5 is located at 6, Building MILLBLDING -

Emission unit 041200 - THIS UNIT CONSISTS OF THE KILN AND BYPASS DUCT SYSTEM AND ASSOCIATED DUST COLLECTORS.

Emission unit 041200 is associated with the following emission points (EP):

33402, 33403, 33404, 33405, 33502, 33503, 33506

Process: BYP is located at Building BYPASS -

Process: CKD is located at Building SCRUBBER -

Process: SCB is located at Building SCRUBBER -

Emission unit 033000 - THIS UNIT CONSISTS OF THE NEW RAW MILL AND KILN FEED SOURCES.

Emission unit 033000 is associated with the following emission points (EP):

23605, 23606, 23607, 23801, 23802, 23803, 23805, 33202, 33203, 33206, 33207

Process: KFP is located at Building PREHEAT -

Process: RMB is located at Building BLEND -

Process: RMR is located at Building RMCYCLON -

Process: RMT is located at Building RAWMILL -

Emission unit 052000 - EMISSION UNIT 052000 CONSISTS OF THE CEMENT MILL 2 SYSTEM. THIS INCLUDES FEED BELTS TO THE CEMENT MILL, THE MILL, CONVEYING EQUIPMENT AFTER THE MILL (BUCKET ELEVATOR AND AIR SLIDES), THE MILL 2 SEPARATOR AND CEMENT COOLER. ALL OF THE COMPONENTS OF THE CEMENT MILL 2 SYSTEM ARE CONTAINED IN THE MILL BUILDING.

Emission unit 052000 is associated with the following emission points (EP):

52201, 53201, 53202

Process: CM2 is located at GROUND, Building MILLBLDING -

Process: FX2 is located at ALL, Building MILLBLDING -

Emission unit 051000 - THIS UNIT CONSISTS OF EXISTING AND MODIFIED EQUIPMENT ASSOCIATED WITH FINISH MILL NO. 1. THIS INCLUDES FEED BELTS TO THE CEMENT MILL, CONVEYING EQUIPMENT AFTER THE MILL (BUCKET ELEVATOR AND AIR SLIDES), THE MILL 1 SEPARATOR AND CEMENT COOLER. ALL OF THE COMPONENTS OF THE CEMENT MILL 1 SYSTEM ARE CONTAINED IN THE MILL BUILDING.

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Emission unit 051000 is associated with the following emission points (EP):

41603, 41604, 52101, 53101, 53102

Process: CM1 is located at GROUND, Building MILLBLDING -

Process: FM1 is located at Building MILLBLDG -

Process: FX1 is located at ALL, Building MILLBLDING -

Emission unit 041100 - THIS UNIT CONSISTS OF THE NEW KILN SYSTEM AND CLINKER COOLER INCLUDING THE KILN, IN-LINE RAW MILL, PREHEATER/PRECALCINER, COAL MILL, ALKALI BYPASS, AND CLINKER COOLER, ALL VENTED THROUGH THE MAIN KILN STACK.

Emission unit 041100 is associated with the following emission points (EP):

33401

Process: CCL New clinker cooler.

Process: KLN is located at Building PREHEAT - New kiln, in-line raw mill, bypass and coal mill.

Emission unit 100000 - EMISSION UNIT 100000 CONTAINS EXISTING EMISSION SOURCES INVOLVED IN THE FACILITY'S WHARF OPERATIONS. THIS INCLUDES THE TRANSFER OF FINISHED PRODUCT FROM BELT 9 TO BARGES. PARTICULATE EMISSIONS FROM THIS TRANSFER IS CONTROLLED BY A BAGHOUSE.

Emission unit 100000 is associated with the following emission points (EP):

58001

Process: CMB is located at GROUND, Building WHARF AREA -

Emission unit 021000 - THIS UNIT CONSISTS OF NEW RAW MATERIALS AND ADDITIVES, STORAGE EQUIPMENT, INCLUDING A NEW SECONDARY CRUSHER AND SCREEN.

Emission unit 021000 is associated with the following emission points (EP):

11501, 13801, 13802, 13803, 23301, 23303, 23601, 23602

Process: ADS is located at Building RAWMAT1 -

Process: ADT

Process: CR2 is located at Building NEW2NDCR -

Process: LSS is located at Building RAWMAT2 -

Process: PBL is located at Building PREBLEND -

Emission unit 072000 - THIS UNIT CONSISTS OF EXISTING COVERED BELT CONVEYORS USED TO TRANSPORT FINISHED CEMENT BETWEEN THE CUSTOMER AND BUFFER SILOS AND FROM THE SILOS TO THE WHARF AREA FOR BARGE SHIPMENT. IT ALSO INCLUDES THE BUFFER SILOS. THE BELT THAT TRANSFERS PRODUCT BETWEEN THE CUSTOMER AND BUFFER SILOS IS LOCATED AT THE NORTH END OF THE BUFFER SILOS. THE THREE BELTS WHICH TRANSPORT PRODUCT TO THE WHARF ARE BELTS 8A, 8B, AND 9. PARTICULATE EMISSIONS FROM ALL TRANSFER POINTS ARE CONTROLLED BY BAGHOUSES.

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Emission unit 072000 is associated with the following emission points (EP):

55001, 55002, 55003, 55004, 55005, 55006, 57001, 57002, 57003, 62001

Process: BS1

Process: CMX is located at Building BUFFESILOS -

Process: CX5 is located at Building BUFFESILOS -

Emission unit 042000 - THIS UNIT CONSISTS OF EXISTING CLINKER DRAG CONVEYORS, BUCKET ELEVATORS, STORAGE SILOS NOS. 8 AND 11 AND ASSOCIATED DUST COLLECTORS. THE DUST SCOOP SYSTEMS CURRENTLY PERMITTED AS PART OF THIS UNIT WILL BE REMOVED.

Emission unit 042000 is associated with the following emission points (EP):

40100, 43102, 43103, 43104, 43105, 43106, 46008, 46011, 46018, 46019

Process: CKD is located at Building FEEDENDBLG -

Process: CX1 is located at Building MILLBLDING -

Process: CX2 is located at Building DISCHENDBG -

Process: PEL is located at Building PUGBLDG -

Process: PUG is located at Building PUGBLDG -

Emission unit 043000 - THIS UNIT CONSISTS OF THE NEW CLINKER HANDLING AND STORAGE EQUIPMENT AND ASSOCIATED DUST COLLECTORS.

Emission unit 043000 is associated with the following emission points (EP):

30903, 32801, 33801, 33901, 33903, 33904, 33905, 41102, 41103, 41104, 41105, 41107, 41108, 41109, 41110, 41112, 41113, 41114, 41115, 41117, 41118, 41119, 41120, 41121, 41122

Process: CLD is located at Building COOLER -

Process: CTF

Process: HTB is located at Building HOTBIN -

Emission unit 071000 - THIS UNIT CONSISTS OF EXISTING CEMENT STORAGE, LOADOUT AND PRODUCT SHIPMENT ACTIVITIES AT THE FACILITY. SPECIFICALLY, THIS INCLUDES THE CUSTOMER SILOS, NORTH AND SOUTH TRUCK LOADING SPOUTS, THE RAILCAR LOADING SPOUTS LOCATED AT THE CUSTOMER SILOS, AND THE EAST AND WEST BAGGING MACHINES LOCATED IN THE PACKHOUSE AS WELL AS THE REVERSIBLE CONVEYORS WHICH TRANSFER PRODUCT TO THESE AREAS. MISCELLANEOUS EMISSION SOURCES ASSOCIATED WITH THE PACKHOUSE (BAG SHREDDER AND VACUUM) ARE ALSO INCLUDED IN EU 071000.

Emission unit 071000 is associated with the following emission points (EP):

62002, 62003, 62004, 62005, 62006, 62007, 62008, 62009, 63001, 63002, 63003, 63004

Process: BAG is located at Building PACKHSEBLG -

Process: CL1 is located at Building CUSTOSILOS -

Process: CL2 is located at Building CUSTOSILOS -

Process: CL3

Process: CX4 is located at Building CUSTOSILOS -

Process: PBS is located at GROUND, Building PACKHSEBLG -

Process: PVC is located at GROUND, Building PACKHSEBLG -

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Emission unit 071100 - THIS UNIT CONSISTS OF THE NEW CEMENT TRANSFER SYSTEM.

Emission unit 071100 is associated with the following emission points (EP):
40801

Process: CMT is located at Building CUSTSILOS -

Emission unit 022000 - THIS UNIT CONSISTS OF THE NEW COAL HANDLING, STORAGE, AND PROCESSING SOURCES.

Emission unit 022000 is associated with the following emission points (EP):
63302, 63303, 63304, 63305, 63306, 63307, 63308, 63309, 66001, 66002

Process: ASF is located at Building ASF -

Process: CLB is located at Building COALBH -

Process: CLR is located at Building COALRAW1 -

Process: PFS is located at Building PFSILO -

Emission unit 091000 - THIS UNIT CONSISTS OF THE PLANT ROADS AND PILES OUTSIDE THE QUARRY.

Process: ROD Fugitive particulate emissions.

Program Applicability

The following chart summarizes the applicability of RAVENA CEMENT PLANT with regards to the principal air pollution regulatory programs:

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

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SIP	YES
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NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - 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 231-5, 231-6) - 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, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - 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 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 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, 6 NYCRR 200.10) - 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

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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.

SCC Codes

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

SCC Code	Description
3-05-006-06	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Kilns
3-05-006-10	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Secondary Crushing
3-05-006-12	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Raw Material Transfer
3-05-006-14	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Clinker Cooler
3-05-006-16	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Clinker Transfer
3-05-006-17	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Clinker Grinding
3-05-006-18	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Cement Silos
3-05-006-99	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (DRY PROCESS) Other Not Classified
3-05-007-06	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Kilns
3-05-007-09	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Primary Crushing
3-05-007-10	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS) Secondary Crushing
3-05-007-12	MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)

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3-05-007-14	PROCESS) Raw Material Transfer MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
3-05-007-16	Clinker Cooler MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
3-05-007-17	Clinker Transfer MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
3-05-007-18	Clinker Grinding MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
3-05-007-19	CEMENT SILOS MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
3-05-007-29	Cement Load Out MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
3-05-007-99	FINISH GRINDING MILL AIR SEPARATOR MINERAL PRODUCTS MINERAL PRODUCTS - CEMENT MANUFACTURE (WET PROCESS)
3-05-025-04	Other Not Classified MINERAL PRODUCTS MINERAL PRODUCTS - CONSTRUCTION SAND AND GRAVEL
3-05-101-03	Hauling MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS CONVEYORS
3-05-102-03	Coal MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS STORAGE BINS
3-05-102-99	Coal MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS STORAGE BINS Other Not Classified

Facility Emissions Summary

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

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a federally enforceable emissions cap or limitation for that contaminant. 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	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
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NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

- Item A: 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 B: 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 C: 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 D: 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 E: 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 F: 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

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or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: 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 H: 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.

Item I: 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 J: 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

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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 K: 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 L: 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: 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

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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 applicable requirement. item_02

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

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

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

Regulatory Analysis

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

FACILITY	ECL 19-0301	84	Powers and Duties of the Department with respect to air pollution control
0-41000/43101/K12	40CFR 52-A.21 (r)	75	Source obligation
0-41100/33401/KLN	40CFR 60-F.62 (a) (3)	12 -70	Portland Cement Plants - Standards

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0-41100/33401/KLN	40CFR 60-F.62 (a) (4)	12 -71	for Nitrogen Oxide NSPS for Portland Cement Plants - Sulfur Dioxide Standards
FACILITY	40CFR 60-000.670 (a)	12 -31	Rock, gravel, sand, and clay processing and conveying
FACILITY	40CFR 60-000.674 (c)	12 -32	Rock, gravel, sand and clay processing and conveying - monitoring of operations
FACILITY	40CFR 60-Y.254 (b)	12 -29, 12 -30	Standards of Performance for Coal Preparation Plants - standards
0-41000/43101/K12	40CFR 63-A.10 (e) (3) (i)	77	Part 63 Reporting Requirements for Excess Emissions and Continuous Monitoring Systems
FACILITY	40CFR 63-A.6 (i)	20 -22	Compliance Date Extension
FACILITY	40CFR 63-LLL.1341	12 -33	Portland Cement NESHAP - Definitions
FACILITY	40CFR 63-LLL.1342	47	NESHAP for Portland Cement Manufacturing - General Standards
0-41000	40CFR 63-LLL.1342	63	NESHAP for Portland Cement Manufacturing - General Standards
FACILITY	40CFR 63-LLL.1343 (b) (1)	20 -23, 20 -24	NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills
0-41000/43101/K12	40CFR 63-LLL.1343 (b) (1)	20 -47, 20 -48, 20 -49, 20 -50	NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills
0-41000/45101/K12	40CFR 63-LLL.1343 (b) (1)	20 -51	NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills
0-41100/33401	40CFR 63-LLL.1343 (b) (1)	12 -67	NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills
0-41100/33401/CCL	40CFR 63-LLL.1343 (b) (1)	20 -53	NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills
0-41100/33401/KLN	40CFR 63-LLL.1343 (b) (1)	12 -73, 12 -74, 20 -54, 20 -55, 20 -56	NESHAP for Portland Cement Manufacturing - Standards for kilns and in-line kilns/raw mills
0-41000/43101/K12	40CFR 63-LLL.1343 (b) (3)	12 -61	Existing, reconstructed or new brownfield/major

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FACILITY	40CFR 63-LLL.1343(d)	20 -25, 20 -26, 20 -27, 20 -28	sources Portland Cement NESHAP - Standards for PM, mercury, THC, D/F at existing sources - Table 2 of Subpart LLL
FACILITY	40CFR 63-LLL.1343(e)	12 -35, 12 -36, 12 -37, 12 -38	Portland Cement NESHAP - Emission limits
FACILITY	40CFR 63-LLL.1346	20 -29	NESHAP for Portland Cement Manufacturing - Standards for new or reconstructed raw material dryers
FACILITY	40CFR 63-LLL.1346(g)	20 -30	Portland Cement NESHAP - startup/shutdown provisions
FACILITY	40CFR 63-LLL.1347	20 -31	NESHAP for Portland Cement Manufacturing - Operation and Maintenance Plan Requirements
FACILITY	40CFR 63- LLL.1348(b) (9)	20 -32	Compliance Requirements - Startup and Shutdown
FACILITY	40CFR 63- LLL.1350(b) (1)	20 -33	Portland Cement NESHAP - PM Monitoring Requirements
FACILITY	40CFR 63-LLL.1350(f)	12 -41, 12 -43, 20 -34	Monitoring requirements
0-20000	40CFR 63-LLL.1350(f)	20 -36	Monitoring requirements
0-41000/-/K12	40CFR 63-LLL.1350(g)	20 -38	Portland Cement NESHAP - D/F Monitoring Requirements
FACILITY	40CFR 63-LLL.1353	12 -45	Notification Requirements
FACILITY	40CFR 63-LLL.1355	20 -35	Recordkeeping Requirements
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9, 22	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	85, 20 -60	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	20 -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)	20 -7	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	20 -8	Trivial Activities -

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FACILITY	6NYCRR 201-6	23, 60, 61	proof of eligibility Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	20 -9	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	20 -1	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (a) (8)	20 -10	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c)	20 -2	Recordkeeping and Reporting of
FACILITY	6NYCRR 201-6.4 (c) (2)	20 -3	Compliance Monitoring Records of
FACILITY	6NYCRR 201- 6.4 (c) (3) (ii)	20 -4	Monitoring, Sampling and Measurement Reporting
FACILITY	6NYCRR 201-6.4 (d) (4)	20 -12	Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (e)	20 -5	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (f)	20 -13	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f) (6)	20 -11	Operational Flexibility
FACILITY	6NYCRR 201-6.5 (e)	25	Off Permit Changes
FACILITY	6NYCRR 201-7	12 -47, 20 -14	Compliance Certification
FACILITY	6NYCRR 202-1.1	18, 20 -15, 20 -16	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.2	28	Required emissions tests.
FACILITY	6NYCRR 202-1.3 (a)	29	Notification.
FACILITY	6NYCRR 202-2.1	6	Acceptable procedures - reference methods
FACILITY	6NYCRR 202-2.5	7	Emission Statements - Applicability
FACILITY	6NYCRR 211.1	12 -8, 12 -9	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	12 -79	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212.3 (b)	30	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212.4 (c)	31	General Process Emission Sources - emissions from existing emission sources
FACILITY	6NYCRR 212.6 (a)	32	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.9	20 -61, 20 -62	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	8	Tables.
FACILITY			Open Fires - Prohibitions

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0-41000	6NYCRR 220-1.2 (b)	20 -37	Particulate emission limit for large existing kilns and clinker coolers.
0-41000/43101/K12	6NYCRR 220-1.4 (a)	20 -44	Opacity limits for portland cement processes.
FACILITY	6NYCRR 220-1.4 (c)	20 -17	Opacity limits for portland cement processes.
0-42000	6NYCRR 220-1.5 (a)	20 -57	Particulate emissions from dust dumps.
0-42000	6NYCRR 220-1.5 (b)	20 -58	Particulate emissions from dust dumps.
0-42000	6NYCRR 220-1.5 (c)	20 -59	Particulate emissions from dust dumps.
0-41000/43101/K12	6NYCRR 220-1.6 (a)	20 -45	Sulfur dioxide emissions from kiln stacks.
FACILITY	6NYCRR 220-1.6 (b) (1)	20 -18	Emission of nitrogen oxides from kiln stacks - existing kiln RACT dates.
0-41000/43101/K12	6NYCRR 220-1.7 (a)	20 -46	Kiln and clinker cooler recordkeeping.
FACILITY	6NYCRR 225-1.2	20 -19, 20 -20, 20 -21	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2 (d)	12 -10	Sulfur-in-fuel limitations - Table 2
FACILITY	6NYCRR 231-8	12 -14, 12 -16, 12 -17	Mods to Existing Major Facilities in Attainment Areas (PSD)
0-41100	6NYCRR 231-8	12 -66	Mods to Existing Major Facilities in Attainment Areas (PSD)
0-41100/-/KLN	6NYCRR 231-8	20 -52	Mods to Existing Major Facilities in Attainment Areas (PSD)
FACILITY	6NYCRR 243-1.6 (a)	12 -18	Permit Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (b)	12 -19	Monitoring Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (c)	12 -20	NOx Ozone Season Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (d)	12 -21	Excess Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (e)	12 -22	Recordkeeping and reporting requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-2.1	12 -23	Authorization and responsibilities - CAIR Designated

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FACILITY	6NYCRR 243-2.4	12 -24	Representative Certificate of representation - CAIR Designated
FACILITY	6NYCRR 243-8.1	12 -25, 12 -26	Representative General Requirements - Monitoring and Reporting
FACILITY	6NYCRR 243-8.5 (d)	12 -27	Quarterly reports re: recordkeeping and reporting - Monitoring and Reporting
FACILITY	6NYCRR 243-8.5 (e)	12 -28	Compliance certification re: recordkeeping and reporting - Monitoring and Reporting

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

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.

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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.

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.

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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) (4)

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 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 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 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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, RAVENA CEMENT PLANT has been determined to be subject to the following regulations:

40 CFR 52.21 (r)

Source Obligation:

40 CFR 60.254 (b)

Opacity and PM emission limits for coal conveying, transfer and storage systems.

40 CFR 60.62 (a) (3)

NOx emission limit for new kilns. Related monitoring recordkeeping and reporting provisions of 40 CFR Part 60, Subpart F are also applicable.

40 CFR 60.62 (a) (4)

SO2 emission limit for new kiln.

40 CFR 60.670 (a)

PM and opacity emission limits for new nonmetallic mineral transfer and storage facilities.

40 CFR 60.674 (c)

This regulation requires quarterly opacity monitoring for non-metallic mineral processing units that use a baghouse to control particulates.

40 CFR 63.10 (e) (3) (i)

These are general conditions that apply to facilities subject to a NESHAP.

40 CFR 63.1341

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40 CFR 63.1342

This section provides general emission standards and operating limits for specific sources at Portland Cement Manufacturing Facilities. Table 1 provides a summary.

40 CFR 63.1343 (b) (1)

This section provides particulate matter emission limitations for certain operations (kilns and in-line kiln/raw mills) at existing, reconstructed, or new brownfield/major sources.

40 CFR 63.1343 (b) (3)

Contained here are Dioxin/Furan emission limits for certain operations (kilns and in-line kiln/raw mills) at existing, reconstructed, or new brownfield/major sources.

40 CFR 63.1343 (d)

40 CFR 63.1343 (e)

PM, opacity, D/F, and THC limits for existing kilns and coolers.

40 CFR 63.1346

40 CFR 63.1346 (g)

40 CFR 63.1347

40 CFR 63.1348 (b) (9)

40 CFR 63.1350 (b) (1)

40 CFR 63.1350 (f)

The owner or operator of an affected source shall monitor D/F emissions by continuously monitoring and recording the exhaust gas temperature from various devices. The temperature monitor shall be calibrated and maintained to ensure accurate readings. Dioxins and furans (D/F) means tetra-, penta-, hexa-, hepta-,

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and octa- chlorinated dibenzo dioxins.

40 CFR 63.1350 (g)

40 CFR 63.1353

Notification requirements including performance tests, visible emission observations, and compliance status, among other things, are specified in this section.

40 CFR 63.1355

Recordkeeping requirements specify that the owner or operator shall maintain files of all required information on site for inspection and review purposes. Generally, the files are kept for a minimum of five years.

40 CFR 63.6 (i)

6 NYCRR 201-6.4 (f)

This section describes the operational flexibility protocol proposed by the facility. The protocol will allow the facility owner or operator to make certain changes at the facility without the need for a permit modification. Changes made pursuant to the protocol must be approved by the Department, and will be rolled into the permit during the next renewal or modification.

6 NYCRR 202-1.2

This regulation specifies that the department is to be notified at least 30 days in advance of any required stack test. The notification is to include a list of the procedures to be used that are acceptable to the department. Finally, free access to observe the stack test is to be provided to the department's representative.

6 NYCRR 202-1.3 (a)

This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. In addition, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6 NYCRR 211.1

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6 NYCRR 212.3 (b)

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

6 NYCRR 212.4 (c)

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

6 NYCRR 212.6 (a)

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

6 NYCRR 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.

6 NYCRR 220-1.2 (b)

6 NYCRR 220-1.4 (a)

6 NYCRR 220-1.4 (c)

6 NYCRR 220-1.5 (a)

6 NYCRR 220-1.5 (b)

6 NYCRR 220-1.5 (c)

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6 NYCRR 220-1.6 (a)

6 NYCRR 220-1.6 (b) (1)

6 NYCRR 220-1.7 (a)

6 NYCRR 225-1.2

This section of the regulation establishes sulfur-in-fuel limitations for coal, residual oil, distillate oil, and waste oil.

6 NYCRR 225-1.2 (d)

The sulfur-in-fuel limitations for residual and distillate oil and for solid fuel are listed in Tables 1,2 and 3 or 6 NYCRR Part 225-1.2(c), (d) and (e)

6 NYCRR 243-1.6 (a)

This condition requires the facility to acknowledge that they are subject to this CAIR regulation and provide owner and contact information. It also requires them to update this information as it changes or provide supplemental information at the Departments request.

6 NYCRR 243-1.6 (b)

This condition obligates the owners and operators of the facility to comply with the monitoring and reporting requirements of the CAIR regulations.

6 NYCRR 243-1.6 (c)

This citation explains the general provisions of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program. This ozone season NOx cap and trade program runs from May 1 through September 30 each year, starting in 2009. Each source shall hold a tonnage equivalent in CAIR NOx Ozone Season allowances that is not less than the total tons of NOx emissions for the ozone season.

6 NYCRR 243-1.6 (d)

This citation for the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains

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some of the penalties that can be imposed on a CAIR NOx Ozone Season source that does not surrender enough CAIR NOx Ozone Season allowances to cover their NOx Ozone Season emissions.

6 NYCRR 243-1.6 (e)

This citation for the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program requires that all reports be submitted as required by this program, and that copies of all records and submissions made for this program be kept on site for at least five years.

6 NYCRR 243-2.1

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains that an CAIR NOx Ozone Season designated representative must be selected to submit, sign and certify each submission on behalf of the source for the this program.

6 NYCRR 243-2.4

This condition describes the required elements of the "Certificate of Representation" for the CAIR program and the certifying language required with submissions to the Department.

6 NYCRR 243-8.1

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains that CAIR NOx Ozone Season Trading Program sources must install, certify and operate monitoring systems the meet the monitoring, recordkeeping, and reporting requirements in Subpart 6 NYCRR 243-8 and in Subpart H of 40 CFR Part 75.

6 NYCRR 243-8.5 (d)

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains what requirements the quarterly reports must meet.

6 NYCRR 243-8.5 (e)

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains the compliance certification requirements the source must follow for each quarterly report.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility.

6 NYCRR Subpart 231-8

This subpart applies to modifications to existing major facilities in attainment areas (prevention of significant deterioration (PSD)).

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Compliance Certification

Summary of monitoring activities at RAVENA CEMENT PLANT:

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

0-41000/43101/K12	75	record keeping/maintenance procedures
0-41100/33401/KLN	12-70	continuous emission monitoring (cem)
0-41100/33401/KLN	12-71	continuous emission monitoring (cem)
FACILITY	12-31	intermittent emission testing
FACILITY	12-32	monitoring of process or control device parameters as surrogate
FACILITY	12-29	monitoring of process or control device parameters as surrogate
FACILITY	12-30	intermittent emission testing
0-41000/43101/K12	77	record keeping/maintenance procedures
FACILITY	20-22	record keeping/maintenance procedures
FACILITY	20-23	record keeping/maintenance procedures
FACILITY	20-24	intermittent emission testing
0-41000/43101/K12	20-47	continuous emission monitoring (cem)
0-41000/43101/K12	20-48	continuous emission monitoring (cem)
0-41000/43101/K12	20-49	continuous emission monitoring (cem)
0-41000/43101/K12	20-50	continuous emission monitoring (cem)
0-41000/45101/K12	20-51	intermittent emission testing
0-41100/33401	12-67	continuous emission monitoring (cem)
0-41100/33401/CCL	20-53	intermittent emission testing
0-41100/33401/KLN	20-54	continuous emission monitoring (cem)
0-41100/33401/KLN	20-55	continuous emission monitoring (cem)
0-41100/33401/KLN	20-56	continuous emission monitoring (cem)
0-41100/33401/KLN	12-73	continuous emission monitoring (cem)
0-41100/33401/KLN	12-74	continuous emission monitoring (cem)
0-41000/43101/K12	12-61	intermittent emission testing
FACILITY	20-25	monitoring of process or control device parameters as surrogate
FACILITY	20-26	monitoring of process or control device parameters as surrogate
FACILITY	20-27	intermittent emission testing
FACILITY	20-28	intermittent emission testing
FACILITY	12-35	monitoring of process or control device parameters as surrogate
FACILITY	12-36	intermittent emission testing
FACILITY	12-37	monitoring of process or control device parameters as surrogate
FACILITY	12-38	intermittent emission testing
FACILITY	20-29	record keeping/maintenance procedures
FACILITY	20-30	record keeping/maintenance procedures
FACILITY	20-31	record keeping/maintenance procedures
FACILITY	20-32	record keeping/maintenance procedures
FACILITY	20-33	record keeping/maintenance procedures
FACILITY	20-34	monitoring of process or control device parameters as surrogate
FACILITY	12-41	monitoring of process or control device parameters as surrogate
FACILITY	12-43	continuous emission monitoring (cem)
0-20000	20-36	record keeping/maintenance procedures
0-41000/-/K12	20-38	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
FACILITY	20-4	record keeping/maintenance procedures

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FACILITY	20-5	record keeping/maintenance procedures
FACILITY	20-13	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	12-4	intermittent emission testing
FACILITY	12-5	intermittent emission testing
0-41000/43101/K12	20-39	continuous emission monitoring (cem)
0-41000/43101/K12	20-40	continuous emission monitoring (cem)
0-41000/43101/K12	20-41	continuous emission monitoring (cem)
0-41000/43101/K12	20-42	continuous emission monitoring (cem)
0-41000/43101/K12	20-43	continuous emission monitoring (cem)
0-41100	12-64	continuous emission monitoring (cem)
0-41100	12-65	intermittent emission testing
FACILITY	20-15	record keeping/maintenance procedures
FACILITY	20-16	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	12-9	record keeping/maintenance procedures
FACILITY	30	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
FACILITY	20-61	monitoring of process or control device parameters as surrogate
FACILITY	20-62	monitoring of process or control device parameters as surrogate
0-41000	20-37	intermittent emission testing
0-41000/43101/K12	20-44	continuous emission monitoring (cem)
FACILITY	20-17	record keeping/maintenance procedures
0-41000/43101/K12	20-45	record keeping/maintenance procedures
FACILITY	20-18	continuous emission monitoring (cem)
0-41000/43101/K12	20-46	record keeping/maintenance procedures
FACILITY	20-19	work practice involving specific operations
FACILITY	20-20	work practice involving specific operations
FACILITY	20-21	work practice involving specific operations
FACILITY	12-10	work practice involving specific operations
FACILITY	12-16	work practice involving specific operations
FACILITY	12-17	work practice involving specific operations
0-41100	12-66	continuous emission monitoring (cem)
0-41100/-/KLN	20-52	continuous emission monitoring (cem)

